INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

December 30, 2003

TO: Interested Parties / Applicant

RE: Wabash Alloys / 159-14125-00008

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).
For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and

(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Wabash Alloys, L.L.C.
841 South 550 West
Tipton, Indiana 46072

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T 159-14125-00008	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: Expiration Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary secondary aluminum production source utilizing scrap aluminum.

Responsible Official:	Paul Lemke
Source Address:	841 South 550 West, Tipton, Indiana 46072
Mailing Address:	841 South 550 West, Tipton, Indiana 46072
General Source Phone Number:	765 - 675 - 6750
SIC Code:	3341
County Location:	Tipton
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency, have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

(b) One (1) aluminum reverberatory smelting furnace, known as furnace #2, installed in 1992, equipped with two (2) natural gas-fired burners, each rated at 12.0 million British thermal units per hour, with the gas-fired burners and the process emissions exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Exhausting of the natural gas-fired burners through Stack #5 has been approved by IDEM, OAQ pursuant to SSM 159-14206-00008, issued on January 30, 2002. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel, which is natural gas with oxygen injected into the system to increase the burning efficiency have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

(c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and

baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour. The cyclone is a material recovery device and does not generate or control emissions.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) closed top non-heated degreaser using non-chlorinated solvents and no halogenated solvents, installed in 1996 (326 IAC 8-3-2) (326 IAC 8-3-5).

(b) Material loading/unloading - operations performed inside the building (326 IAC 6-3-2).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OM&M) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and

reissue a Part 70 permit.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than one hundred (100) pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 7, 1992. The plan consists of:

(a) All access roads to facilities, storage and equipment shall be paved;

(b) Raw materials, products and waste storage shall be under roof or enclosed and not conducive for fugitive dust generation;

(c) Sweeping all paved roads at least once per month, weather permitted;

(d) Aluminum slag/dross shall be cooled under the confines of the emission hoods (until visible emissions ceased); and

(e) Dross and slag shall be stored under roof.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

C.10 Standard Operating Procedure (SOP)\

(a) The Permittee:

(1) submitted a standard operating procedure (SOP) in August 2002,

(2) may not modify the SOP from the version submitted to IDEM without the express written consent of IDEM. IDEM has the sole authority to approve or deny modifications to the SOP,

(3) shall provide each operator with a copy of the SOP, and train them on its contents, and

(4) shall post the SOP in the production office, where it shall remain posted until July 27, 2005.

(b) The Permittee shall comply with the following items of the SOP:

(1) Production equipment (furnaces and crusher) cannot be operated when the associated baghouse system is not operating. A furnace or crusher cannot be charged unless the baghouse system that collects the smoke or dust from that equipment is operating.

(2) If any personnel suspects that the baghouse system is not operating, the Production Supervisor or Maintenance Supervisor or such other person with operational authority should be contacted as soon as possible.

(3) As soon as possible after discovering that the baghouse system is not operating for

any reason, including a power outage or equipment malfunction, the Equipment Operator must stop charging the equipment.

(4) Charging of the affected equipment must not restart until after the Production Supervisor or Maintenance Supervisor or such other person with operational authority confirms that the baghouse system has restarted and orders the Equipment Operator to restart charging.

(5) To confirm that the baghouse system has restarted, the Production Supervisor or Maintenance Personnel or such other person with operational authority shall visually inspect the baghouse differential pressure gauge and the fan drive.

(6) Any questions regarding the Standard Operating Procedure should be directed to the Production Supervisor or Environmental Manager.

Testing Requirements [326 IAC 2-7-6(1)]

C.11 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.12 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

C.13 Compliance Schedule [40 CFR Part 63, Subpart RRR]

On October 16, 2001, IDEM, OAQ approved an extension of the final compliance standards and date contained in 40 CFR Part 63, Subpart RRR for the scrap shredder and the two (2) group 1 reverberatory furnaces. The termination date of this extension is March 23, 2004, which is the final compliance date for 40 CFR Part 63, Subpart RRR.

(a) The Permittee shall complete the following by the specified dates and report within thirty (30) days thereafter or obtain IDEM, OAQ approval to amend the extension letter.

(1) Construction contracts issued by June 30, 2002,

(2) Initiate onsite construction by September 30, 2002, and

(3) Complete construction and initiate debugging by May 31, 2003.

(b) The Permittee shall operate all facilities in compliance with emission limits by March 23, 2004.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.14 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.15 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.16 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate the instrument employed shall have a scale such that the expected normal reading shall be

no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.17 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.18 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68 is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.19 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OM&M) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days

after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OM&M) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OM&M Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OM&M) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OM&M) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.21 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

(1) Indicate estimated actual emissions of criteria pollutants from the source;

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32), "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management

Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.22 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Aluminum Reverberatory Smelting Furnaces #1 and #2

(a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Both burners have the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

(b) One (1) aluminum reverberatory smelting furnace, known as furnace #2, installed in 1992, equipped with two (2) natural gas-fired burners, each rated at 12.0 million British thermal units per hour, with the gas-fired burners and the process emissions exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Exhausting of the natural gas-fired burners through Stack #5 has been approved by IDEM, OAQ pursuant to SSM 159-14206-00008, issued on January 30, 2002. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel, which is natural gas with oxygen injected into the system to increase the burning efficiency have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the following limits shall apply:

(a) The PM emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 1.04 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

(A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.919 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.240 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(b) The PM_{10} emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.928 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

(A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.864 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.128 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(c) The VOC emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.769 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

(A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.761 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.0168 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(d) The CO emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.747 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

(A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.618 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.257 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(e) The NO_X emissions:

if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.686 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

(A) from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnace #1 combustion emissions, shall not exceed 0.531 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.306 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

Compliance with these limits, including total emissions from the fugitive pouring and casting operation of 12.2 tons of VOC per year and 0.872 tons of NO_X per year and the total emissions from insignificant activities of 4.34 tons of PM per year, 14.0 tons of PM_{10} per year, 18.7 tons of VOC per year, 21.3 tons of CO per year and 23.4 tons of NO_X per year renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

Effective March 23, 2004, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to furnaces #1 and #2, except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.1.3 Secondary Aluminum Smelting Limits [40 CFR Part 63.1500 (Subpart RRR)]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1505, the following conditions shall apply to furnaces #1 and #2:

(a) The Permittee shall be in compliance with the following emission limitations and operating requirements upon startup:

(1) The Permittee shall not discharge or allow to be discharged to the atmosphere any three- (3-) day, twenty-four- (24-) hour rolling average emissions of PM in excess of:

$$L_{cPM} = \frac{\sum_{i=1}^{n} \left(L_{tiPM} x T_{ti} \right)}{\sum_{i=1}^{\wedge} T_{ti}}$$

where L_{tiPM} = The PM emission limit for individual emission unit in the secondary aluminum processing unit I in paragraph (i)(1) and (2) of 40 CFR 63.1505.

T_{ti} = The feed/charge rate for individual emission unit I; and

L_{cPM} = The PM emission limit for secondary aluminum processing unit I.

The PM emission limit (L_{cPM}) for a Group 1 furnace without an in-line fluxer (each reverberatory furnace) at a secondary aluminum production facility shall be 0.40

pounds per ton of feed/charge or per ton of aluminum produced. [40 CFR 63.1505 (i)] [40 CFR 63.1505(k)]

(2) The Permittee shall not discharge or allow to be discharged to the atmosphere any three- (3-) day, twenty-four- (24-) hour rolling average emissions of HCl in excess of:

$$L_{cHCl} = \frac{\sum_{i=1}^{n} \left(L_{tiHcl} x T_{ti} \right)}{\sum_{i=1}^{\wedge} T_{ti}}$$

where L_{tiHCl} = The HCl emission limit for individual emission unit in the secondary aluminum processing unit I in paragraph (i)(4) of 40 CFR 63.1505.

T_{ti} = The feed/charge rate for individual emission unit I; and

L_{cHCl} = The HCl emission limit for secondary aluminum processing unit I.

The HCl emission limit (L_{cHCl}) for a Group 1 furnace without an in-line fluxer (each reverberatory furnace) at a secondary aluminum production facility shall be 0.40 pounds per ton of feed/charge or per ton of aluminum produced [40 CFR 63.1505 (i)][40 CFR 63.1505(k)] or ten (10%) percent of the uncontrolled HCl emissions by weight [40 CFR 63.1505 (i)].

(3) The Permittee shall not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of total tetra-, penta-, hexa-, and octa-chlorinated dibenzo dioxins and furans (D/F) in excess of:

$$L_{cDF} = \frac{\sum_{i=1}^{n} \left(L_{tiDF} x T_{ti} \right)}{\sum_{i=1}^{\wedge} T_{ti}}$$

where L_{tiDF} = The D/F emission limit for individual emission unit in the secondary aluminum processing unit.

L_{cDF} = The D/F emission limit for secondary aluminum processing unit, .and

T_{ti} = The feed/charge rate for individual emission unit I.

The D/F emission limit (L_{cDF}) for a Group 1 furnace without an in-line fluxer (furnaces #1 and #2) at a secondary aluminum production facility shall be 15 micrograms of D/F TEQ per megagram (2.1×10^{-4} gr of D/F TEQ per ton) of feed/charge or per ton of aluminum produced. Where TEQ is the toxicity equivalents for dioxins and furans as defined in “Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update”. [40 CFR 63.1505(i)][40 CFR 63.1505(k)]

(b) Identification, emission limits and means of compliance shall be posted on furnaces #1 and #2.

D.1.4 Labeling [40 CFR Part 63.1506(b)]

By March 23, 2004, the Permittee shall provide and maintain easily visible labels that shall be posted at furnaces #1 and #2. Said labels shall identify the applicable emission limits and means of compliance, including:

(a) The type of affected source or emission unit (e.g., group 1 furnace, group 2 furnace, in-line fluxer); and

(b) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and addition practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.

D.1.5 Capture and Control Systems [40 CFR Part 63.1506(c)]

By March 23, 2004, pursuant to 40 CFR 63.1506(c), the Permittee shall:

(a) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference: 40 CFR 63.1502)

(b) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(c) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

D.1.6 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR Part 63.1510(b)]

By March 23, 2004, the Permittee shall prepare and implement for each of the furnaces #1 and #2, a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

(a) Process and baghouse parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.

(b) A monitoring schedule for each of the furnaces #1 and #2.

(c) Procedures for the proper operation and maintenance of each of the furnaces #1 and #2, and baghouse used to meet the applicable emission limits or standards in 40 CFR 63.1505.

(d) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(1) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(2) Procedures for the quality control and quality assurance of continuous emission as required by the general provisions in Subpart A of this part.

(e) The procedure to be used for determining charge/feed (or throughput) weight if a measurement

device is not used.

(f) Corrective actions to be taken when process or operating parameters or baghouse parameters deviate from the value or range established in 40 CFR 63.1510(b)(1), including:

(1) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and

(2) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(g) A maintenance schedule for each of the furnaces #1 and #2, and their baghouses that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

D.1.7 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from each of the furnaces #1 and #2, shall not exceed 19.1 pounds per hour each when operating at a process weight rate of 9.95 tons of per hour each.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each of the furnaces #1 and #2, and their baghouses.

Compliance Determination Requirements

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this Part 70 Operating Permit, or up to one (1) year prior to permit issuance, to demonstrate compliance with Conditions and D.1.1 and D.1.7, the Permittee shall perform PM and PM_{10} testing utilizing methods as approved by the Commissioner for furnaces #1 and #2. Pursuant to 326 IAC 3-6-3(b), when testing furnaces #1 and #2, furnaces #1 and #2 shall be operated shall be operated at ninety-five (95%) percent or more of their maximum design capacities, or under conditions representative of normal operations or under capacities or conditions specified and approved by the IDEM, OAQ. This test shall be repeated at least once every two and a half (2.5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63 Subpart RRR]

By March 23, 2004 compliance date,

(a) In order to demonstrate compliance with Condition D.1.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HCl and D/F testing of the north and/or south baghouse(s) on furnaces #1 and #2, using methods, in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The Permittee may use an alternative test method subject to the approval of the IDEM, OAQ. Testing may be conducted up to one (1) year prior to permit issuance. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) The Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for D/F. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511 (g) are met.

D.1.11 Particulate Control and Capture/Collection Systems [40 CFR 63.1506(c)]

(a) In order to comply with Conditions D.1.1 and D.1.7, the north or south baghouse for particulate control shall be in operation and control emissions from furnaces #1 and #2, at all times that either furnace is in operation.

(b) On and after March 23, 2004, in order to comply with Conditions D.1.3 and D.1.5, the baghouse(s) for particulate control used to demonstrate compliance required by Condition D.1.10(a) shall be in operation and control emissions from furnaces #1 and #2, at all times that the furnaces are in operation according to the procedures and requirements of the OM&M plan.

D.1.12 Feed/Charge Determination [40 CFR 63.1506(d)]

On and after March 23, 2004, pursuant to 40 CFR 63.1506, the Permittee shall install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test. The Permittee shall operate each measurement system or other weight determination procedure in accordance with the Operation, Maintenance, and Monitoring Plan. Alternatively, the Permittee may choose to measure and record aluminum production weight from furnaces #1 and #2, rather than feed/charge weight provided that the aluminum production weight is measured for furnaces #1 and #2, within a secondary aluminum processing unit and all calculations to demonstrate compliance with the emission limits for furnaces #1 and #2, are based on aluminum production weight rather than feed/charge weight.

D.1.13 Fabric Filter Monitoring Requirements [40 CFR 63.1510(f)]

On and after March 23, 2004, the following requirements apply to each of the furnaces #1 and #2:

(a) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(b) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997).

(c) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(d) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

(e) The bag leak detection system shall be equipped with a device to continuously record the

output signal from the sensor.

(f) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

(g) For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.

(h) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(i) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(j) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

D.1.14 Secondary Aluminum Smelting Compliance Determination [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1510, the following conditions shall apply to furnaces #1 and #2:

(a) Pursuant to 40 CFR 63.1506(m), for each furnace, the Permittee shall:

(1) Initiate corrective action within one (1) hour of a bag leak detection system alarm; complete the corrective action procedures in accordance with the Operation, Maintenance, and Monitoring Plan; and operate each fabric filter system such that the bag leak detection system alarm does not sound more than five (5%) percent of the operating time during a six (6) month reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of one (1) hour. If the Permittee takes longer than one (1) hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.

(2) Maintain the three (3) hour average inlet temperature for each fabric filter at or below the average temperature established during the performance test plus twenty-five (25) degrees Fahrenheit.

(3) For a continuous-lime injection system, the Permittee shall maintain free-flowing alkaline agent in the hopper to the feed device at all times and maintain the alkaline agent feeder setting at the same level established during the performance test. For the purposes of this rule lime means calcium oxide or other alkaline reagent; and lime-injection means the continuous addition of lime upstream of the fabric filter.

(4) Maintain the total reactive flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.

(b) The Permittee shall use a continuous lime-injected fabric filter to comply with the requirements of 40 CFR 63, Subpart RRR; and therefore pursuant to 40 CFR 63.1510(i), the Permittee shall:

(1) Verify that the lime (or other alkaline agent) is always free-flowing by inspecting the feed hopper or silo at least once each eight (8) hour period and recording the results of each inspection. If the lime or other alkaline agent is found not to be free-flowing during any of the eight (8) hour periods, the Permittee shall increase the frequency of inspections to at least once every four (4) hour period for the next three (3) days. The Permittee may return to inspections at least once every eight (8) hour period if corrective action results in no further blockages of lime or other alkaline agent during the three (3) day period.

(2) The Permittee shall also record the feeder setting once each day of operation.

(c) Pursuant to 40 CFR 63.1510(j), for furnaces #1 and #2, the Permittee shall:

(1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or reactive liquid flux injected into each furnace. The monitoring system shall record the weight for each fifteen (15) minute period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test. The accuracy of the weight measurement shall be within one (1%) percent of the weight of the reactive component of the flux being measured. The Permittee may apply to IDEM, OAQ to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of within one (1%) percent accuracy impracticable. The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(2) Calculate and record the flux injection rate (kilogram per megagram or pound per ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).

(3) Record, for each fifteen (15) minute time period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of reactive flux.

(4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test.

(d) Pursuant to 40 CFR 63.1510(s)(1), the Permittee shall include, within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:

(1) The identification of each emission unit in the secondary aluminum processing unit;

(2) The specific control technology of pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;

(3) The emission limit calculated for each secondary aluminum processing unit and performance test result with supporting calculations demonstrating initial compliance with each applicable emission limit;

(4) Information and data demonstrating compliance for each emission unit with all applicable design equipment work practice or operational standards of Subpart RRR; and

(5) The monitoring requirements applicable to each emission unit in a secondary

aluminum processing unit and the monitoring procedures for daily calculation of the three- (3-) day, twenty-four- (24-) hour rolling average using the procedure in 40 CFR 63.1510(t).

(e) The SAPU compliance procedures within the OM&M plan may not contain any of the information provided in 40 CFR 63.1510(s)(2)(i) through (iv).

Pursuant to 40 CFR 63.1506(a)(2), the completion of the initial performance tests for the secondary aluminum processing units shall be considered to be the date of approval of the Operation, Maintenance and Monitoring Plan by IDEM, OAQ.

D.1.15 Fabric Filter Inlet Temperature Monitoring Requirements [40 CFR 63.1510(h)]

(a) By March 23, 2004, the Permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases entering north and south baghouses consistent with the requirements for continuous monitoring systems in 40 CFR Part 63, Subpart A.

(b) The temperature monitoring device shall meet each of these performance and equipment specifications:

(1) The monitoring system shall record the temperature in fifteen- (15-) minute block averages and calculate and record the average temperature for each three- (3-) hour block period.

(2) The recorder response range shall include zero (0) and one and one half (1.5) times the average temperature established according to the requirements in 40 CFR 63.1512(n).

(3) The reference method shall be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.16 Labeling [40 CFR 63.1510(c)]

Effective March 23, 2004 for each of the furnaces #1 and #2, the Permittee shall inspect the labels required in Condition D.1.4 at least once per calendar month to confirm that the posted labels as required by the operational standard in 40 CFR 63.1506(b) are intact and legible.

D.1.17 Capture/Collection System [40 CFR 63.1510(d)]

Effective March 23, 2004 for each of the furnaces #1 and #2, the Permittee shall inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements pursuant to 40 CFR 63.1506(c) and record the results of each inspection.

D.1.18 Feed/Charge Determination [40 CFR 63.1510(e)]

By March 23, 2004 for each of the furnaces #1 and #2, the Permittee shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from each furnace over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs shall be measured and recorded on an emission unit-by-emission unit basis. The accuracy of the weight measurement device or procedure shall be $\pm$1 percent of the weight being measured.

D.1.19 Corrective Action [40 CFR 63.1506(p)]

Effective March 23, 2004, when a process parameter or baghouse operating parameter deviates from the value or range established and incorporated in the OM&M plan, the Permittee shall initiate corrective action. The corrective action taken, shall restore operation of furnace #1 and/or #2, and/or the north and/or south baghouses to their normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

In addition, the corrective actions taken shall include follow-up actions necessary to return the process or baghouse parameter level(s) to the applicable value or range of values, and steps to prevent the likely recurrence of the cause of a deviation.

D.1.20 Compliance Monitoring Requirements [40 CFR 63.1510(t)] [40 CFR 63.1510(u)]

Effective March 23, 2004, pursuant to 40 CFR 63, Subpart RRR, the Permittee shall monitor furnaces #1 and #2 according to the following requirements:

(a) The Permittee shall calculate and record the three- (3-) day, twenty-four (24-) hour rolling average emissions of PM, HCl, and D/F for each furnace on a daily basis. To calculate the three- (3-) day, twenty-four (24-) hour rolling average, the Permittee shall:

(1) Calculate and record the total weight of material charged to each furnace for each twenty-four- (24-) hour day of operation using the feed/charge weight data collected as required under Subpart RRR. If the Permittee chooses to comply on the basis of the weight of the aluminum produced by the furnaces #1 and #2, rather than the weight of the material charge to the furnaces, all performance test emissions results and all calculations shall be conducted on the aluminum production weight basis.

(2) To provide emissions for each furnace for the twenty-four- (24-) hour period, in pounds: multiply the total feed/charge weight to the furnace or the weight of aluminum produced by the furnace for the twenty-four- (24-) hour period, by the emission rate (in lb/ton of feed/charge) for that furnace (as determined during the emission test).

(3) Calculate and record the three- (3-) day, twenty-four- (24-) hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the three (3) most recent consecutive days and dividing by three (3).

(b) Pursuant to 40 CFR63.1510(u), as an alternative to the procedures in (a)(1) above, the Permittee may demonstrate through performance tests, that each individual furnace is in compliance with the applicable emission limit.

D.1.21 Parametric Monitoring

The Permittee shall record the total static pressure drop across the north and south baghouses used in conjunction with furnaces #1 and #2, at least once per shift when either furnace is in operation. When for any one reading, the pressure drop across the north or south baghouses is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in

accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.22 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling furnaces #1 and #2. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.23 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.24 Visible Emissions Notations

(a) Visible emission notations of furnace #1 and #2 stack exhausts #2 and #3 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.25 Record Keeping Requirements

(a) To document compliance with Condition D.1.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.1.21, the Permittee shall maintain records of the total static pressure once per shift during normal operation.

(c) To document compliance with Condition D.1.22, the Permittee shall maintain records of the results of the inspections required under Condition D.1.22.

(d) To document compliance with Condition D.1.24, the Permittee shall maintain records of visible emission notations of the furnaces #1 and #2, stack exhausts #2 and #3 once per shift.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.26 Secondary Aluminum Production Record Keeping Requirements [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1517, the Permittee shall:

(a) As required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Subpart RRR.

(b) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off site.

(c) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.

(d) In addition to the general records required by 40 CFR 63.1510(b), the Permittee of a furnace with a lime-injected fabric filter shall maintain records of:

(1) For a bag leak detection system, the number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

(2) The following regarding lime injection:

Records of inspections at least once every eight- (8-) hour period verifying that lime is present in the feeder hopper or silo and flowing, including any inspection where blockage is found, with a brief explanation of the cause of the blockage and the corrective action taken, and records of inspections at least once every four- (4-) hour period for the subsequent three (3) days. If flow monitors, pressure drop sensors or load cells are used to verify that lime is present in the hopper and flowing, records of all monitor or sensor output including any event where blockage was found, with a

brief explanation of the cause of the blockage and the corrective action taken;

(3) For each of the furnaces #1 and #2, records of fifteen- (15-) minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective action taken.

(4) For each continuous monitoring system, records required by 40 CFR 63.10(c).

(5) For each of the furnaces #1 and #2, weights for each operating cycle or time period used in the performance test.

(6) Records of monthly inspections for proper unit labeling for each of the furnaces #1 and #2, subject to labeling requirements.

(7) Records of annual inspections of emission capture/collection and closed vent systems.

(8) Records for any approved alternative monitoring or test procedure.

(9) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan;

(B) For major sources, OM&M plan; and

(C) Site-specific secondary aluminum processing unit emission plan.

(10) For each of the furnaces #1 and #2, records of total charge weight for each twenty-four- (24-) hour period and calculations of three- (3-) day, twenty-four (24-) hour rolling average emissions.

D.1.27 Secondary Aluminum Production Reporting Requirements [40 CFR Part 63, Subpart RRR]

(a) Effective March 23, 2004, pursuant to 40 CFR 63.1510 and 63.1516, the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ of the intent to conduct a performance test at least sixty (60) days before the performance test is scheduled.

(b) The Permittee shall submit a notification of compliance status report within sixty (60) days after the compliance date of March 23, 2004. The notification shall be signed by the responsible official who shall certify its accuracy. A complete notification of compliance status report shall include the information specified in paragraphs (1) through (10). The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. If a Permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for each of the furnaces #1 and #2, for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.

(4) The compliant operating parameter value or range established for each of the furnaces #1 and #2, with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

(5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).

(6) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 40 CFR 63.1510(f).

(7) Approved OM&M plan.

(8) Startup, shutdown, and malfunction plan, with revisions.

(c) The Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining furnaces #1 and #2, during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and baghouses used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan shall include:

(1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or baghouse, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

(d) The Permittee shall submit semiannual reports within sixty (60) days after the end of each six- (6-) month period. Each report shall contain the information specified in 40 CFR 63.10 (c). When no deviations of parameters have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period.

A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within 1 hour.

(2) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(3) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(4) Furnace #1 and/or #2, was not operated according to the requirements of Subpart RRR.

(5) A deviation from the three- (3-) day, twenty-four- (24-) hour rolling average emission limit for the furnaces #1 and #2.

(e) The Permittee shall submit the results of any performance test conducted during the reporting period, including one (1) complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the Permittee shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined the semiannual report, that occurred during the year were reported as required by this subpart; and

(2) All monitoring, record keeping, and reporting requirements were met during the year.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Scrap Aluminum Shredder/Crusher

(c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour. The cyclone is a material recovery device and does not generate or control emissions.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the following limits shall apply:

(a) The PM emissions from the shredder/crusher and associated conveyors shall not exceed 0.980 pounds per ton of aluminum scrap shredded and a maximum capacity of 23.0 tons of aluminum scrap per hour.

(b) The PM_{10} emissions from the shredder/crusher and associated conveyors shall not exceed 0.980 pounds per ton of aluminum scrap shredded and a maximum capacity of 23.0 tons of aluminum scrap per hour.

Compliance with these limits, including total emissions from insignificant activities of 4.34 tons of PM per year, 14.0 tons of PM_{10} per year, 18.7 tons of VOC per year, 21.3 tons of CO per year and 23.4 tons of NO_X per year renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

Effective March 23, 2004, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the shredder/crusher except when otherwise specified in 40 CFR Part 63, Subpart RRR.

D.2.3 Secondary Aluminum Production Limits [40 CFR Part 63, Subpart RRR]

By March 23, 2004, pursuant to 40 CFR 63.1505, the Permittee of the shredder/crusher shall not discharge or cause to be discharged to the atmosphere PM emissions in excess of 0.01 grains per dry standard cubic foot.

D.2.4 Capture and Control Systems [40 CFR Part 63.1506(c)]

(a) By March 23, 2004, pursuant to 40 CFR 63.1506(c), the Permittee of the shredder/crusher shall design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of “Industrial Ventilation: A Manual of Recommended Practice” (incorporated by reference: 40 CFR 63.1502).

(b) By March 23, 2004, pursuant to 40 CFR 63.1506(c), the Permittee of the shredder/ crusher shall:

(1) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and

(2) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.

D.2.5 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR Part 63.1510(b)]

By March 23, 2004, the Permittee shall prepare and implement for the shredder/ crusher a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

(a) Process as well as the baghouse parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.

(b) A monitoring schedule for the shredder/crusher.

(c) Procedures for the proper operation and maintenance of the shredder/crusher as well as the baghouse used to meet the applicable emission limits or standards in 40 CFR63.1505.

(d) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(1) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(2) Procedures for the quality control and quality assurance of continuous emission as required by the general provisions in Subpart A of this part.

(e) Corrective actions to be taken when process or operating parameters or cyclone and baghouse parameters deviate from the value or range established in 40 CFR 63.1510(b)(1), including:

(1) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and

(2) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(f) A maintenance schedule for the shredder/crusher as well as its baghouse that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

D.2.6 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the shredder/crusher shall not exceed 33.5 pounds per hour when operating at a process weight rate of 23.0 tons of per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this

permit, is required for the shredder/crusher and its baghouse.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this Part 70 Operating Permit to demonstrate compliance with Conditions D.2.1 and D.2.6, the Permittee shall perform PM and PM_{10} testing utilizing methods as approved by the Commissioner for the shredder/crusher. Pursuant to 326 IAC 3-6-3(b), when testing the shredder/crusher, the operation shall be operated ninety-five (95%) percent or more of their maximum design capacity, under conditions representative of normal operations, or under a capacity or conditions specified and approved by the IDEM, OAQ. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63 Subpart RRR]

By the March 23, 2004 compliance date,

(a) In order to demonstrate compliance with Condition D.2.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM testing of the baghouse stack exhaust on the shredder/ crusher using methods in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The owner or operator may use an alternative test method, subject to the approval of the IDEM, OAQ. These tests shall be repeated at least once every five (5) years. Testing shall be conducted in accordance with Section C- Performance Testing.

(b) The Permittee shall establish a minimum or maximum operating parameter value, or an operating parameter range for each parameter to be monitored as required by 40 CFR 63.1510 that ensures compliance with the applicable emission limit for PM. The Permittee may use existing data in addition to the results of the performance test to establish operating parameter values for compliance monitoring provided the requirements of 40 CFR 63.1511(g) are met.

D.2.10 Particulate Control and Capture/Collection Systems [40 CFR 63.1506(c)]

(a) In order to comply with Conditions D.2.1 and D.2.6, the baghouse for particulate control shall be in operation and control emissions from the shredder/crusher at all times that the shredder/crusher is in operation.

(b) On and after March 23, 2004, in order to comply with Conditions D.2.3 and D.2.4, the baghouse for particulate control shall be in operation and control emissions from the shredder/ crusher at all times that the shredder/crusher is in operation according to the procedures and requirements of the OM&M plan.

D.2.11 Fabric Filter Monitoring Requirements [40 CFR 63.1510(f)]

By March 23, 2004, the following requirements apply to the Permittee of the shredder/crusher:

(a) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(b) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997).

(c) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(d) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

(e) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.

(f) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

(g) For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.

(h) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(i) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(j) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

D.2.12 Secondary Aluminum Smelting Compliance Determination [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1506(e), the Permittee of the shredder/crusher with emissions controlled by the fabric filter shall operate a bag leak detection system. Therefore, the Permittee shall:

(a) Initiate corrective action within one (1) hour of a bag leak detection system alarm and complete the corrective action procedures in accordance with the Operation, Maintenance, and Monitoring Plan.

(b) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than five (5%) percent of the operating time during a six (6) month reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of one (1) hour. If the Permittee takes longer than one (1) hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.13 Capture/Collection System [40 CFR 63.1510(d)]

Effective March 23, 2004, the Permittee of the shredder/crusher shall inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in Condition D.2.4 and record the results of each inspection.

D.2.14 Corrective Action [40 CFR 63.1506(p)]

Effective March 23, 2004, when a process parameter or baghouse operating parameter deviates from the value or range established and incorporated in the OM&M plan, the Permittee shall initiate corrective action. The corrective action taken, shall restore operation of the shredder/crusher as well as its baghouse to their normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

In addition, the corrective actions taken shall include follow-up actions necessary to return the process or baghouse parameter level(s) to the applicable value or range of values, and steps to prevent the likely recurrence of the cause of a deviation.

D.2.15 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shredder/crusher at least once per shift when the shredder/crusher is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.16 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the shredder/crusher. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.2.17 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee

satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.18 Visible Emissions Notations

(a) Visible emission notations of the shredder/crusher stack exhaust #4 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.19 Record Keeping Requirements

(a) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(b) To document compliance with Condition D.2.15, the Permittee shall maintain records of the total static pressure once per shift during normal operation.

(c) To document compliance with Condition D.2.16, the Permittee shall maintain records of the results of the inspections required under Condition D.2.16.

(d) To document compliance with Condition D.2.18, the Permittee shall maintain records of visible emission notations of the shredder/crusher stack exhaust #4 once per shift.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.20 Secondary Aluminum Production Record Keeping Requirements [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1517, the Permittee shall:

(a) As required by 40 CFR 63.10(b), the Permittee shall maintain files of all information (including all reports and notifications) required by the general provisions and Subpart RRR.

(b) The Permittee shall retain each record for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent two (2) years of records shall be retained at the source. The remaining three (3) years of records may be retained off site.

(c) The Permittee may retain records on microfilm, computer disks, magnetic tape, or microfiche; and report required information on paper or on a labeled computer disk using commonly

available and EPA-compatible computer software.

(d) In addition to the general records required by 40 CFR 63.1510(b), the Permittee of the shredder/crusher controlled by a baghouse shall maintain records of:

(1) For a bag leak detection system, the number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

(2) For each continuous monitoring system, records required by 40 CFR 63.10(c).

(3) Feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.

(4) Annual inspections of emission capture/collection and closed vent systems.

(5) Any approved alternative monitoring or test procedure.

(6) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:

(A) Startup, shutdown, and malfunction plan;

(B) For major sources, OM&M plan; and

(C) Site-specific secondary aluminum processing unit emission plan.

D.2.21 Secondary Aluminum Production Reporting Requirements [40 CFR Part 63, Subpart RRR]

(a) Effective March 23, 2004, pursuant to 40 CFR 63.1510 and 63.1516, the Permittee shall provide notification of the anticipated date for conducting performance tests. The Permittee shall notify the IDEM, OAQ of the intent to conduct a performance test at least sixty (60) days before the performance test is scheduled.

(b) The Permittee shall submit a notification of compliance status report within sixty (60) days after the compliance date of March 23, 2004. The notification shall be signed by the responsible official who shall certify its accuracy. A complete notification of compliance status report shall include the information specified in (1) through (7). The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. If a Permittee submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report shall include:

(1) All information required in 40 CFR 63.9(h). The Permittee shall provide a complete performance test report for the shredder/crusher for which a performance test is required. A complete performance test report includes all data, associated measurements, and calculations.

(2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system.

(3) The compliant operating parameter value or range established for the shredder/crusher with supporting documentation and a description of the procedure used to establish the value (e.g., fabric filter inlet temperature), including the operating cycle

or time period used in the performance test.

(4) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).

(5) If applicable, analysis and supporting documentation demonstrating conformance with EPA guidance and specifications for bag leak detection systems in 40 CFR 63.1510(f).

(6) Approved OM&M plan.

(7) Startup, shutdown, and malfunction plan, with revisions.

(c) The Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the shredder/crusher during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process as well as the baghouse used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan shall include:

(1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or baghouse, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

(d) The Permittee shall submit semiannual reports within sixty (60) days after the end of each six- (6-) month period. Each report shall contain the information specified in 40 CFR 63.10 (c). When no deviations of parameters have occurred, the Permittee shall submit a report stating that no excess emissions occurred during the reporting period.

A report shall be submitted if any of these conditions occur during a six- (6-) month reporting period:

(1) The corrective action specified in the OM&M plan for a bag leak detection system alarm was not initiated within one (1) hour.

(2) An excursion of a compliant process or operating parameter value or range (e.g., fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).

(3) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

(4) A shredder/crusher was not operated according to the requirements of Subpart RRR.

(e) The Permittee shall submit the results of any performance test conducted during the reporting period, including one (1) complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.

(f) For the purpose of annual certifications of compliance required by 40 CFR Part 70 or 71, the Permittee shall certify continuing compliance based upon, but not limited to, the following conditions:

(1) Any period of excess emissions, as defined the semiannual report, that occurred during the year were reported as required by this subpart; and

(2) All monitoring, record keeping, and reporting requirements were met during the year.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) closed top non-heated degreaser using non-chlorinated solvents and no halogenated solvents, installed in 1996.

(b) Material loading/unloading - operations performed inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover shall be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility

shall be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, shall be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the material loading/unloading - operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Wabash Alloys, L.L.C.
Source Address: 841 South 550 West, Tipton, Indiana 46072
Mailing Address: 841 South 550 West, Tipton, Indiana 46072
Part 70 Permit No.: T 159-14125-00008

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Wabash Alloys, L.L.C.
Source Address: 841 South 550 West, Tipton, Indiana 46072
Mailing Address: 841 South 550 West, Tipton, Indiana 46072
Part 70 Permit No.: T 159-14125-00008

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Wabash Alloys, L.L.C.
Source Address: 841 South 550 West, Tipton, Indiana 46072
Mailing Address: 841 South 550 West, Tipton, Indiana 46072
Part 70 Permit No.: T 159-14125-00008

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	**Wabash Alloys, L.L.C.**
Source Location:	**841 S. 550 West, Tipton, Indiana 46072**
County:	**Tipton**
SIC Code:	**3341**
Operation Permit No.:	**T 159-14125-00008**
Permit Reviewer:	**Mark L. Kramer**

On August 30, 2002, the Office of Air Quality (OAQ) had a notice published in the Tipton County Tribune, Tipton, Indiana, stating that Wabash Alloys had applied for a Part 70 Operating Permit to operate a stationary secondary aluminum production source utilizing scrap aluminum. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On September 27, 2002, Patricia F. Sharkey of Mayer, Brown, Rowe & Maw, attorneys for Wabash Alloys, submitted comments on the proposed Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

General Comments - Specification of "applicable requirements"

We request that all permit conditions be explicitly referenced to authorizing "applicable requirements."

As is discussed below, Wabash objects to conditions in this permit which are not authorized by an "applicable condition."

This objection is based on 326 IAC 2-7-5(1)(A) which states:

"The Part 70 permit shall specify and reference the origin of and authority for each term or condition and identify any difference in form as compared to the applicable requirement upon which the term or condition is based."

Comment 2:

Specification of "federally enforceability"

We request that all permit conditions be clearly labeled to indicate whether or not they are federally enforceable.

Wabash objects to any term or condition of this permit that is not derived from a federal program requirement, an approved SIP provision, or a federally enforceable permit condition which is not explicitly designated as "NOT FEDERALLY ENFORCEABLE."

This objection is based on 326 IAC 2-7-7(b) which states:

> "…the commissioner shall specifically designate as not being federally enforceable under the CAA, any terms and conditions included in a Part 70 permit that are not required under the CAA or under any of its applicable requirements."

Responses 1 and 2:

IDEM, OAQ has specifically cited all conditions in the permit which are not federally enforceable. Therefore, all other conditions in the proposed permit are federally enforceable. For example, the process weight rate requirement is part of the federally approved SIP and is, therefore, federally enforceable. Although 326 IAC 6-3 has been amended recently, the portions of the rule as applied to Wabash Alloys - Tipton Plant have not been changed. With regard to visible emission requirements and compliance response plans, IDEM, OAQ believes that the correct authority for both of these requirements is 326 IAC 2-7-5(1) in that these are operational requirements and limitations that assure compliance with all applicable requirements. Part 70 makes clear that the permit must assure compliance, and the compliance response plan and visible emission notations both assure compliance with underlying applicable emission limitations. IDEM, OAQ does not believe that it is necessary to specifically discuss in the TSD whether conditions constitute the "applicable requirement" or are to "assure compliance" because we have broken the D section into three (3) sections: Emission Limitations and Standards, Compliance Monitoring, and Compliance Determination. Also, it is IDEM's policy to only label the requirements that are not federally enforceable. Unless otherwise specified, all conditions are federally enforceable.

Therefore, no changes to any of the conditions in the proposed Part 70 permit are required.

Comment 3:

Restatement of NESHAP Regulatory Requirements

Replace restatement of NESHAP requirements with incorporation by reference.

Wabash objects to the paraphrasing of the NESHAP requirements in the permit and in the TSD. We note that Indiana has incorporated the federal Secondary Aluminum NESHAP standards by reference rather than adopting a separate and different set of standards. Therefore, restating the requirements in the permit and the TSD is unnecessary. To do so runs the risk that the paraphrasing will misstate the federally applicable requirements and mislead those interpreting the permit in the future. In fact, Wabash found a number of errors in the proposed permit in sections that should precisely reflect the federal standards. Although Wabash is providing in Attachment 1 a mark-up of the NESHAP permit provisions which Wabash has identified as containing errors, it is possible that more errors exist in this language. One of the problems discovered was the failure of the proposed permit language to reflect recently adopted amendments to the federal Secondary Aluminum NESHAP. By restating the federal NESHAP requirements in the permit, IDEM is creating a permit that will become outdated due to amendments to the federal regulations.

Wabash requests that the permit and the TSD incorporate the federal regulations, including amendments that may be adopted in the future, by reference rather than restate the regulatory provisions.

Response 3:

IDEM, OAQ duly recognizes that prior to and directly after the 30-day public comment period, on September 24, 2002 US EPA amended portions of the Subpart RRR proposed on June 14, 2002. As such, any relevant changes and those brought to our attention by Wabash Alloys, L.L.C. have been

revised in the response to the specific Section D comments.

IDEM, OAQ incorporates the specific requirements of the NESHAP so that both the source and IDEM, OAQ inspectors have specific conditions for those facilities subject to the various parts of the NESHAP. These include emission limits, compliance monitoring, as well as record keeping and reporting. Also the frequency of all compliance monitoring is clearly stated. Therefore, IDEM OAQ will not just cite the NESHAP and/or Sections of the NESHAP applicable to the source or facilities.

Comment 4:

Table of Contents

We note that the Table of Contents refers to the wrong pages in some places. Recognizing that more changes may occur, we simply request that IDEM review and update the Table of Contents before finalizing the permit.

Response 4:

IDEM, OAQ has confirmed that the revised pagination is reflected in the Table of Contents.

Comment 5:

Furnace References

Throughout the permit the furnaces are referred to as "the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2." While accurate, this language is very cumbersome and makes the permit provisions unnecessarily hard to read. We recommend simply referring to "furnace #1" and "furnace #2" for the individual furnaces. Note that Section A.2(a) and(b) actually define furnace #1 and furnace #2 in the first sentence, e.g. "One aluminum reverberatory smelting furnace, *known as furnace # 1…*" We recommend that the term "furnaces #1 and #2" be used to refer to the two furnaces collectively. There are no other furnaces at the facility.

Response 5:

Throughout the entire permit, except in equipment description in Condition A.2 and Section D.1, reference to the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, has been changed to furnaces #1 and #2.

Comment 6:

Shredder/Crusher References

The permit also uses the unnecessarily long phrase "scrap aluminum shredder/crusher" to refer to the shredder/crusher. We recommend this be shortened to "shredder/crusher."

Response 6:

Throughout the entire permit, except in equipment description in Condition A.2 and Section D.2, reference to the scrap aluminum shredder/crusher has been changed to shredder/crusher.

Comment 7:

Specific Comments

Section A Source Summary

A.2 Emission Units and Pollution Control Equipment Summary comment: Subsection (a) does not properly describe the existing furnace #1 and related equipment.

Suggested language:

(a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. ~~Both burners have the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency.~~ The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, **with the ability to burn oxy fuel which is natural gas with oxygen injected into the system to increase the burning efficiency,** have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002 .~~but have not yet been installed.~~ Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

Response 7:

Condition A.2 has been revised as requested since there is no change in the equipment or the potential to emit as follows:

(a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. ~~Both burners have the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency.~~ The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, **with the ability to burn oxy fuel which is natural gas with oxygen injected into the system to increase the burning efficiency,** have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002 .~~but have not yet been installed.~~ Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

Comment 8:

A.3 Specifically Regulated Insignificant Activities

Delete subsection (b) pertaining to material loading/unloading.

The proposed permit indicates that “Material loading/unloading – operations performed inside the building” is specifically regulated under 326 IAC 6-3-2—the process weight rate rule. We respectfully disagree. The February 6, 2002 amendments to Rule 3 make it clear that this rule applied only to “manufacturing processes.” The term “manufacturing processes” is defined as:

> …any single or series of actions, operations, or treatments in which a mechanical, physical, or chemical transformation of material occurs that emits, or has the potential to emit, particulate in the production of the product. The term includes transference, conveyance, or repair of a product." [emphasis added]

"Material loading or unloading" does not involve the "mechanical, physical or chemical transformation of material" and it does not involve the "transference, conveyance or repair of a product." It is simply does not involve processing of a material or have anything to do with a product. Beyond the clear language of the 326 IAC 6-3-2, PM emissions from loading and unloading activities cannot be calculated on a process weight rate basis. The PM emissions generated by these activities are true fugitive emissions generated in different locations throughout the building in insignificant and even trivial quantities. They are not associated with any single process, cannot be captured and controlled like process emissions and cannot be calculated based on process weight. Therefore, it is incorrect to apply the process weight rule to the "material loading/unloading operations" described in this proposed condition.

Moreover, PM from indoor material loading and unloading within buildings is addressed as fugitive particulate emissions. Section 326 IAC 6-5-4(f) is the "applicable requirement" for these operations. If material loading and unloading is to be deemed to be a specifically regulated insignificant activity (any more than any other fugitive emission source), it should be listed as regulated under 326 IAC 6-5-4(f).

Also in D.3 Facility Operation Conditions – Insignificant Activities

D.3.3 Particulate Matter

Delete condition: Process weight rate rule is not applicable to "material loading/unloading – operations performed inside a building."

As noted in comments on Section A.3 (above), "material loading /unloading-operations performed inside a building" are not regulated under the process weight rate rule (326 IAC 6-3-2) because they do not involve a "manufacturing process." Rather, PM emissions from material loading and unloading is regulated as fugitive particulate emissions under the 326 IAC 6-5-4(f). If IDEM believes this activity should be considered to be a "specifically regulated insignificant activity," this section should reference 326 IAC 6-5-4(f).

Response 8:

The requirement of 326 IAC 6-3-2 apply to all manufacturing processes, regardless of whether they are significant or insignificant activities defined by 326 IAC 2-7-1(21) and regardless of whether emissions are fugitive or ducted to a stack. Since the particulate emissions from material loading and unloading operations could be controlled and often are, these particulate emissions are not considered fugitive whether inside a building or outside. Loading and unloading of material and/or products is considered moving it from one place to another, i.e, transference. In addition, if the material being loaded and unloaded is needed to manufacturer the product, then the material handling is subject to the requirements of 326 IAC 6-3-2. For example, handling of materials like coal, limestone, and ash at a power plant are all covered by the requirements of 326 IAC 6-3. While the product at a power plant is electricity, the power plant can not produce electricity without coal to burn, limestone to control emissions, or managing the bi-product of ash as part of the process. Similarly, at Wabash Alloys handling the scrap aluminum and other materials used in the processing of the aluminum are vital to the production of the high quality aluminum products produced.

It should be noted that IDEM, OAQ made it perfectly clear to commenters during the various meetings on rulemaking that material handling was regulated by the requirements of 326 IAC 6-3. Therefore, the requirements of 326 IAC 6-3-2 apply to the insignificant activity of material loading/unloading and no changes have been made to the proposed permit.

Comment 9:

Section C. Emission Limitations and Standards

C. 6 Fugitive Particulate Matter Emissions Limitation

Replace proposed language for C.6 with the following:

> "Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 7, 1992 and any amendments thereto that may be approved by the Department pursuant to the procedures established in 326 IAC 6-5-7."

The provisions of the Tipton Fugitive Dust Control Plan should not be enumerated in the permit. Wabash agrees that its Fugitive Particulate Emissions Control Plan is intended to "become a part of the source's operation permit." 326 IAC 6-5-7(f). However, it is not necessary to recite the provisions of the plan in the permit text for the plan to become a part of the permit. This can be accomplished by simply making the elements of the plan, as may be amended, enforceable under the permit.

It is unnecessarily cumbersome for both Wabash and IDEM to have the provisions of the Fugitive Dust Plan inserted in the Title V permit. The Fugitive Dust Plan is intended to encompass a variety of activities that may produce dust and, of necessity, is a "living document" that must be amended from time to time to respond to changes in operations and to ensure that it properly identifies and addresses fugitive emission sources. If the specific elements of the plan are recited in the permit it will require a permit modification proceedings in order to update the plan. It is not clear how this permit modification would be characterized, but if it is characterized as a "minor" or "significant modification," amending the plan could involve lengthy procedures -- none of which were envisioned by the Indiana regulations establishing the plan requirement. During this permit modification process, Wabash will be faced with delaying operational changes or violating a permit condition.

Response 9:

The Part 70 rules at 326 IAC 2-7-6(1) require that the Part 70 Operating Permit include all applicable requirements. IDEM, OAQ has determined that the contents of a fugitive dust control plan must be included in a Part 70 Operating Permit. If the specific contents of the fugitive dust control plan were not included in the permit, it would be impossible for the public to review and comment on the fugitive dust plan. Therefore, IDEM, OAQ has retained the description of the current fugitive dust plan in the proposed Part 70 Operating Permit.

If Wabash Alloys desires to change their fugitive dust control plan in the future, only an Administrative Amendment may be required. Thus, if an Administrative Amendment is required, Wabash Alloys can go ahead and make the requested changes without waiting for IDEM, OAQ to issue the Administrative Amendment.

Comment 10:

C.7 Operation of Equipment

See comments on Section D.1.11 in Comment 25. Note that a baghouse system, composed of two multi-compartment baghouses, is the control equipment for the two smelting furnaces.

This provision states: “Except as otherwise provided by statue or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.”

If Section D.1.11 is not amended to make it clear that it is the “baghouse system,” not the individual baghouses, which must be operated at all times, Wabash objects to this section. See discussion under Section D.1.11 below.

Response 10:

Condition C.7 (Operation of Equipment) is clear because the condition states "...used to comply with an applicable requirement..." Wabash Alloys has performed an IDEM, OAQ-approved stack test that substantiates that Wabash Alloys - Tipton Plant can comply with the PM and PM_{10} emission limits using only one (1) of the two (2) baghouses. Both baghouses do not have to operate simultaneously to comply with the emission limitations.

IDEM, OAQ believes that re-wording Condition C.7 would only make it less clear. IDEM, OAQ has clearly explained in Section D.1 that only one (1) of the two (2) baghouses needs to be operated at a time.

Therefore, IDEM, OAQ has elected not to use the suggested language “baghouse system” because it still leaves open the question of whether one (1) or both of the baghouses need to be operating at all times. IDEM, OAQ wants to be very clear as to whether one (1) or both baghouses need to be operated so that the inspector will know for sure when he/she is performing an inspection. The specific changes to the conditions in Section D.1 are discussed in response to Wabash Alloys’ comments recommending the use of the phrase, “baghouse system”. See response to Comment 25.

Comment 11:

C.12 Compliance Schedule

Delete the internal milestones and deadlines.

Although Wabash is not currently planning to request any change in the internal milestones, Wabash should have the opportunity to request an amendment to the internal milestones in its extension letter. If these internal dates are in the text of the permit, a permit modification will be required to change them. This may take more time than is available and effectively negate the Company’s ability to demonstrate to IDEM that amended internal dates will not affect its ability to comply with the final compliance date. The language suggested below requires compliance with the schedule in the approved extension, but allows for the possibility that the approved extension could be amended.

Suggested Language:

“On October 16, 2001, IDEM, OAQ approved an extension of the final compliance

standards and date contained in 40 CFR part 63, Subpart RRR for this scrap shredder and the two (2) group 1 reverberatory furnaces. The termination date of this extension is March 23, 2004, which is the final compliance date for 40 CFR Part 63, Subpart RRR. The Permittee shall comply with the compliance schedule specified in the approved extension letter and any amendments thereto which are approved by IDEM."

Response 11:

The IDEM, OAQ Compliance Branch confirms that the compliance schedule, which is the basis for granting the extension, should be included in the Part 70 Operating Permit. The schedule, if necessary, should be able to be adjusted through a minor permit revision as long as the final compliance deadline is not changed. Therefore, IDEM, OAQ has not revised the proposed Condition C.12 (now C.13).

Comment 12:

C. 18 Compliance Response Plan

This condition should be deleted.

No valid regulatory authority is cited for this condition. The Regulations cited require a Preventive Maintenance Plan and require certification, testing, monitoring, reporting and recordkeeping. However, they do not require the specification of enforceable response steps for every compliance monitoring condition. The scope of the proposed Compliance Response Plan is substantially different from the scope of the Preventive Maintenance Plan which is required by regulation and referenced elsewhere in the Title V permit. See 326 IAC 1-6-3. It also differs from the Operation, Maintenance and Monitoring Plan which is specified by federal regulations, does not require specification of the response steps to be taken, and applies only to the MACT "affected sources" after March 23, 2004. 40 CFR 63.1510(b).

As a practical matter, Wabash objects to this requirement because necessary response steps cannot always be anticipated in advance, and failure to take a "cookie-cutter" approach to compliance response should not be a permit violation. The proposed CRP creates enforceable requirements that exceed those US EPA found necessary or desirable for MACT emission sources which are otherwise subject to the most stringent requirements. This confirms Wabash's view that tying the hands of plant personnel in performing compliance response simply isn't a good idea. Although this condition states that other response steps may be taken, the equipment operator's first reaction is likely to be to "follow the plan" –even when other steps may make more sense.

As a legal matter, Wabash objects to this requirement because it has not been adopted through valid rulemaking procedures. While it may be within the IDEM's authority to adopt regulations requiring that Title V permits contain Compliance Response Plans, it has not adopted such regulations. Title V permitting must be based upon and reflect existing "applicable requirements" and is not a vehicle for imposing new requirements. As there is no underlying "applicable requirement" in state or federal regulations, permits, agreements or orders which requires such this plan, this condition is invalid.

Response 12:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language

over the past three (3) years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each Permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each Permittee's Annual Compliance Certification. Each Permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." The Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. Response maintenance included inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the Permittee would take in the event an inspection indicated an "out of specification situation", and set the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the equipment to prevent an exceedance of an emission limit or violation of other permit requirements.

After issuing the first draft Title V permits in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was to remove the corrective action and related schedule requirements from the PMP requirement and placed them into some other requirement. This suggestion was based, in some part, on the desire that a Permittee's maintenance staff handle the routine maintenance of the equipment, and a Permittee's environmental compliance and engineering staff handle the compliance monitoring.

IDEM agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps."

The CRP response steps and schedule requirements are examples of documenting procedures developed from good business practices and the prevention of environmental problems. Permittees already have maintenance schedules and trouble shooting guides that specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the Permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

There is sufficient authority for requiring a Compliance Response Plan as part of a Compliance Monitoring Plan. 326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the sources compliance, even where the applicable requirement does not require periodic testing or instrumental

monitoring.

Furthermore, the Compliance Response Plan (CRP) is part of the overall Compliance Monitoring Plan (CMP). The CMP calls for two types of maintenance: preventive maintenance and corrective maintenance. The OAQ received many comments from the regulated community regarding the previous version of the CMP, which included preventive and corrective maintenance in the same document, the Preventive Maintenance Plan (PMP). These comments requested that the OAQ split the PMP into two plans: one for preventive maintenance and one for corrective maintenance. Therefore, the OAQ responded by splitting the preventive maintenance and the corrective maintenance into the PMP and CRP, respectively. The requirement that the permit contain operational requirements and limitations that assure compliance with all applicable requirements, coupled with the rule requirements for compliance monitoring, provides all the necessary authority for this permit requirement. Therefore, the IDEM disagrees with your position that the CRP be eliminated from the above mentioned condition.

Comments 13, 14, 15, 16 and 17:

D.1.1 Prevention of Significant Deterioration (PSD)

(a) D.1.1 (a)(1)

The PM emission limits for the #1 and #2 furnaces should be changed to 0.80 lbs/ton of feed to reflect the maximum emissions allowable for the furnaces (coupled with the burners and facility-wide insignificant activities) to remain regulated as PSD minor sources.

The proposed 0.400 pounds per ton emission rate for process PM is based on the limit prescribed in 40 CFR Subpart RRR (MACT) which is not an “applicable requirement” until the Subpart RRR compliance date which is March 23, 2004. The Subpart RRR emission limit is stated in Section D.1.3. The other “applicable requirements” resulting in PM emission limits are the process weight rate and fugitive particulate emission rules which also are addressed elsewhere in this permit.

The function of the emission limitation contained in this section is solely to ensure that PM emissions from furnaces #1 and #2, together with the burners and facility-wide “insignificant activities,” remain below the PSD threshold level of 100 tpy. It should be noted that this is an emission limit which has been established to assure PSD compliance, rather than the “potential to emit” for furnaces #1 and #2.

Attachment 2 hereto provides calculated annual emissions which demonstrate that an emission limit of 0.80 lbs/ton for each of furnace #1 and #2 will ensure that PM emissions from the furnaces, when coupled with the burners and facility-wide insignificant activities, remain less than 100 tpy.

(b) D.1.1(b)

The PM-10 emission limits in this section should be changed to 0.80 lbs/ton of feed to reflect the maximum emissions allowable for each of furnaces #1 and #2 (coupled with the burners and other insignificant emission sources) to remain regulated as a PSD minor source.

PM-10 is addressed in this Title V permit at the request of the permit applicant solely to ensure that PM-10 emissions from the furnaces, coupled with their associated burners and facility-wide insignificant activities, remain below the PSD threshold level of 100 tpy. PM-10

is not regulated under Subpart RRR and is not subject to any state emission limitation. Therefore, the PM-10 emission limits should be based on the maximum allowable emissions necessary to assure compliance with PSD minor source status. It should be noted that this is an emission limit and does not represent the "potential to emit" for furnaces #1 and #2.

Attachment 2 hereto provides calculated annual emissions which demonstrate that an emission limit of 0.80 lbs/ton of feed for each of furnaces #1 and #2 will ensure that PM-10 emissions from the furnaces, together with emissions from the burners and facility-wide insignificant emission sources, remain less than 100 tpy.

(c) D.1.1(c)

The VOC emission limits in this section should be changed to 0.752 lbs/ton of feed to reflect the maximum emissions allowable for each of furnaces #1 and #2 (coupled with the burners and other insignificant emission sources) to remain regulated as a PSD minor source. Also, delete separate VOC emission limit for "poured and cast" feed.

It is unnecessary to include a separate VOC limit for "poured and cast" feed because the casting molds are not a source of VOC emissions.

Attachment 2 hereto provides calculated annual emissions which demonstrate that an emission limit of 0.752 lbs/ton of feed for each of furnaces #1 and #2 will ensure that VOC emissions from the furnaces, together with emissions from the burners and facility-wide insignificant emission sources, remain less than 100 tpy.

(d) D.1.1(e)

Delete separate NO_X emission limit for "poured and cast" feed.

It is unnecessary to include a separate NO_X limit for "poured and cast" feed because the casting molds used at the Tipton plant are not a source of NO_X emissions.

Furthermore, the referenced annual emissions limits calculated for insignificant activities should be changed to 8.4 tons of PM, 18 tons of PM-10, 32 tons of VOC, 33.9 tons of CO and 39.2 tons of NO_X.

See discussion under D.1.1 and D.1.2 above. These annual emission limits will ensure that emissions from facility-wide insignificant activities, coupled with emissions from the furnaces and burners, will remain less than 100 tpy. See Attachment 2.

In addition, add ladle cleaning and ladle repair to the list of insignificant activities.

Wabash has identified ladle cleaning (which occurs approximately once per week) and ladle repair (which occurs approximately once per month) as insignificant activities. See Attachment 3 for detailed information on the emissions estimate for these insignificant, and perhaps trivial, activities. See Attachment 4 for a breakdown of the insignificant and/or trivial activities included in the PSD minor source calculation of emissions from insignificant activities.

Revise individual space heater input capacity to 0.08 mm BTU/hr (8 space heaters total).

Responses 13, 14, 15, 16 and 17:

IDEM, OAQ has changed the PM emission rate which was originally requested by the Permittee for the interim period until Subpart RRR compliance is required on and after March 23, 2004. The potential to emit calculations in spreadsheets of Appendix A to the Addendum to TSD as well as the Limited Potential to Emit table from the TSD have been revised as follows.

Fires version 6.23 still indicates that pouring and casting (SCC 3-04-001-14) from secondary aluminum production has emission factors of 0.01 pounds of NO_X per ton of metal charged and 0.14 pounds of VOC per ton of metal charged. Since no additional evidence has been supplied to support the contention that these NO_X and VOC pouring and casting emission factors do not apply to the secondary aluminum production at the Tipton Plant, Conditions D.1.1(c) and (e) for pouring and casting have not been revised as requested.

Also as a result of the request to add insignificant activities and correct the rating of the eight (8) space heaters, the list of insignificant activities has been updated as follows:

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total rating: **30.08** ~~35.84~~ million British thermal units per hour, including:

(1) Eight (8) space heaters, rated at **0.08** ~~0.8~~ million British thermal units per hour each.

(2) Four (4) molten metal pump preheater boxes, rated at 0.8 million British thermal units per hour each.

(3) Nine (9) hot metal pot stands, each holding one (1) 2.0 million British thermal units per hour pot furnace, installed during various unknown years.

(4) Seven (7) natural gas-fired ladle heaters/pot stands, rated at 2.0 million British thermal units per hour, each.

(x) Ladle cleaning (which occurs approximately once per week) and ladle repair (which occurs approximately once per month)

Attached are revised emission calculations for the entire source including insignificant ladle cleaning and repair in pages 1 - 8 of Appendix A to this document.

Therefore, Conditions D.1.1(a), (b), (c), (d), (e), D.3.3 as well as the limited potential-to-emit for insignificant activities have been changed. The emission limits in Condition D.1.1 have been revised by stack number based on process emissions from furnaces #1 and #2 exhausting through Stacks #2 and #3. The natural gas combustion emissions from furnace #1 also exhaust to Stacks #2 and #3 while the combustion emissions from furnace #2 will exhaust through Stack #5. Until Stack #5 is constructed and operational, all emissions from furnaces #1 and #2 will be ducted through the baghouse system and exhaust through Stacks #2 and #3. Therefore, two (2) set of emissions limits are incorporated for these two (2) scenarios.

On March 3, 2003, U.S. EPA published a notice for “Conditional Approval of Implementation Plan: Indiana” in the Federal Register / Vol. 68, No.41 at pages 9892 through 9895. This notice grants conditional approval to the PSD State Implementation Plan (SIP) under provisions of 40 CFR 51.166 and 40 CFR 52.770 while superceding the delegated PSD SIP authority under 40 CFR 52.793. The

effective date for these provisions is April 2, 2003. Therefore, the PSD permits will be issued under the authority of 326 IAC 2-2 and will no longer be issued under the provision of 40 CFR 52.21 and 40 CFR 124. Therefore the cite to 40 CFR Part 52.21 has been deleted based on the PSD SIP approval status as follows:

D.1.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] ~~[40 CFR Part 52.21]~~

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the following limits shall apply:

(a) The PM emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 1.04 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

~~(1)~~**(A)** from **Stacks #2 and #3** ~~the aluminum reverberatory smelting furnaces, known as~~ **associated with** furnaces #1 and #2 **process emissions and furnace #1 combustion emissions**, shall not exceed **0.919** ~~0.400~~ pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

~~(2) from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 78.35 pounds per million cubic feet of fuel combusted~~.

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.240 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(b) The PM_{10} emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.928 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

~~(1)~~**(A)** from **Stacks #2 and #3** ~~the aluminum reverberatory smelting furnaces, known as~~ **associated with** furnaces #1 and #2 **process emissions and furnace #1 combustion emissions**, shall not exceed **0.864** ~~0.653~~ pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

~~(2) from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 42.0 pounds per million cubic feet of fuel combusted.~~

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.128 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(c) The VOC emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.769 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

~~(1)~~**(A)** from **Stacks #2 and #3** ~~the aluminum reverberatory smelting furnaces, known as~~ **associated with** furnaces #1 and #2 **process emissions and furnace #1 combustion emissions**, shall not exceed **0.761** ~~0.750~~ pounds per ton of feed melted ~~and 0.140 pounds per ton of feed poured and cast~~ and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

~~(2) from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 5.5 pounds per million cubic feet of fuel combusted.~~

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.0168 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(d) The CO emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.747 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

~~(1)~~**(A)** from **Stacks #2 and #3** ~~the aluminum reverberatory smelting furnaces, known as~~ **associated with** furnaces #1 and #2 **process emissions and furnace #1 combustion emissions**, shall not exceed **0.618** ~~0.490~~ pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, and

~~(2) from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 84.0 pounds per million cubic feet of fuel combusted.~~

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.257 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

(e) The NO_X emissions:

(1) if Stack #5 is not constructed, from Stacks #2 and #3 associated with furnaces #1 and #2 process emissions and furnaces #1 and #2 combustion emissions, shall not exceed 0.686 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace, or

(2) if Stack #5 is constructed:

~~(1)~~**(A)** from **Stacks #2 and #3** ~~the aluminum reverberatory smelting furnaces, known as~~ **associated with** furnaces #1 and #2 **process emissions and furnace #1 combustion emissions**, shall not exceed **0.532** ~~0.380~~ pounds per ton of feed and 0.010 pounds per ton of feed poured and cast and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace**, and**

~~(2) from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 100.0 pounds per million cubic feet of fuel combusted.~~

(B) from Stack #5 associated with only the furnace #2 combustion emissions shall not exceed 0.306 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour.

Compliance with these limits, including total emissions from **the fugitive pouring and casting operation of 12.2 tons of VOC per year and 0.872 tons of NO_X per year and the total emissions from** insignificant activities of **4.34** ~~28.3~~ tons of PM per year, **14.0**~~16.0~~ tons of PM_{10} per year, **18.7** ~~19.95~~ tons of VOC per year, **21.3** ~~33.9~~ tons of CO per year and **23.4** ~~38.3~~ tons of NO_X per year, renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) ~~and 40 CFR 52.21~~ not applicable.

In addition, in Comment 32, the Permittee has also requested that the existing reverbatory furnaces and operations installed in 1992, except the scrap shredder be limited to less than ninety-nine (99) tons per year to render the requirements of 326 IAC 2-2 not applicable. Also the PM and PM_{10} emission factors after control for the scrap shredder have been adjusted to 0.980 pounds per ton of scrap and this modification of a minor source is also limited to less than one hundred (100) tons per year to render the requirements of 326 IAC 2-2 not applicable. Therefore, the source is now considered a major PSD source. As such, the previous modification, SSM 159-14206-00008, issued on January 30, 2002, is considered a minor PSD modification since the PSD significant levels of 25, 15, 40, 40, and 100 for PM, PM_{10}, VOC, NO_X and CO were not exceeded. Therefore, Conditions A.1 as well as D.2.1(a) and (b) have been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary secondary aluminum production source utilizing scrap aluminum.

Source Status: Part 70 Permit Program
Major ~~Minor~~ Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

D.2.1 Prevention of Significant Deterioration (PSD) [326 IAC 2-2] ~~[40 CFR Part 52.21]~~

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the following limits shall apply:

(a) The PM emissions from the ~~scrap aluminum~~ shredder/crusher and associated conveyors shall not exceed **0.980** ~~0.148~~ pounds per ton of aluminum scrap shredded and a maximum capacity of 23.0 tons of aluminum scrap per hour.

(b) The PM_{10} emissions from the ~~scrap aluminum~~ shredder/crusher and associated conveyors

shall not exceed **0.980** ~~0.148~~ pounds per ton of aluminum scrap shredded and a maximum capacity of 23.0 tons of aluminum scrap per hour.

Compliance with these limits, including total emissions from insignificant activities of **4.34** ~~28.3~~ tons of PM per year, **14.0**~~16.0~~ tons of PM_{10} per year, **18.7** ~~19.95~~ tons of VOC per year, **21.3** ~~33.9~~ tons of CO per year and **23.4** ~~38.3~~ tons of NO_X per year renders the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) ~~and 40 CFR Part 52.21~~ not applicable.

The followed table from the Technical Support Document has been updated to indicate the unrestricted potential emissions of the source based on the above changes in emission factors and treating the installation of the scrap shredder as a minor modification to an existing minor source.

Pollutant	**Potential To Emit** (tons/year)
PM	**623** ~~639~~
PM_{10}	**475** ~~482~~
SO_2	**15.7**~~15.6~~
VOC	99.0
CO	99.0
NO_X	99.0

In addition, the following table from the Technical Support Document has been updated and summarizes the potential to emit, reflecting all limits, of the emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Reverberatory Furnaces #1 & 2 Process Only (1992)	**69.7** ~~34.9~~	**69.7** ~~56.9~~	11.8	**65.6** ~~65.4~~	42.7	33.1	69.1
Pouring/Casting (1992)	0.00	0.00	1.74	12.2	0.00	0.872	0.00
Scrap Shredder (1996)	**98.7** ~~14.9~~	**98.7** ~~14.9~~	0.00	0.00	0.00	0.00	0.00
Reverberatory Furnaces #1 & #2 Natural Gas Combustion (1992) (m 2001)	20.9	11.2	0.523	1.47	22.4	26.7	0.504

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
Insignificant Activities							
Other Natural Gas Combustion	**0.284** ~~0.330~~	**1.14** ~~1.32~~	**0.090** ~~0.104~~	**0.822** ~~0.954~~	**12.6** ~~14.6~~	**15.0** ~~17.4~~	**0.282** ~~0.327~~
Loading & Unloading	1.48	0.698	0.00	0.00	0.00	0.00	0.00
Paved Roads	2.20	2.20	0.00	0.00	0.00	0.00	0.00
Degreaser	0.00	0.00	0.00	0.297	0.00	0.00	0.00
Assay Furnace	0.000	0.000	0.00	0.00	0.00	0.00	0.00
Ladle Cleaning and Repair	8.10	8.10	0.00	0.00	0.00	0.00	0.00
Other Insignificant Activities	**4.34** ~~24.3~~	**14.0** ~~11.8~~	1.5	18.7	**21.3** ~~19.3~~	**23.4** ~~20.9~~	1
Total Emissions	**198** ~~99.0~~	**198** ~~99.0~~	**15.7** ~~15.6~~	99.0	99.0	99.0	~~71.1~~ **71.0**

D.3.3 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2] ~~[40 CFR 52 Subpart P]~~

Pursuant to 326 IAC 6-3-2 **(Particulate Emission Limitations for Manufacturing Processes)** ~~and 40 CFR 52 Subpart P,~~ the **allowable particulate emission rate** ~~PM~~ from the material loading/ unloading - operations shall not exceed the pound per hour emission rate established as E in the following formula:

Comment 19:

D.1.2 and D.2.2 General Provisions Relating to NESHAP

As a general matter, Wabash notes that Indiana has not adopted a NESHAP standard for secondary aluminum production, but rather has incorporated the federal NESHAP language by reference. Therefore, the applicable NESHAP requirements are contained in the General Provisions in 40 CFR 63 and Subpart RRR.

While we identify below certain provisions of the draft permit which differ from the federal NESHAP and are thus null and void, Wabash objects to any conditions in this permit which impose requirements on an “affected source” under Subpart RRR that differ from the federal requirements, unless such requirements are not inconsistent with the NESHAP requirements and are supported by duly promulgated and more stringent state regulations.

Response 19:

IDEM, OAQ has reviewed the following comments and the Final Rule Amendments to National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, 40 CFR Part 63, Subpart RRR, 67 Fed. Reg. 59792, dated September 24, 2002. This Federal Register was published while the proposed Part 70 Operating Permit was undergoing the 30-day period for public comment. IDEM, OAQ has revised the appropriate conditions of the proposed permit to reflect Subpart RRR as amended.

Comment 20:

D.1.3. Secondary Aluminum Smelting Limits

Subsection (a)(2) does not accurately reflect the NESHAP:

1. Add provision providing Permittee with the ability to demonstrate HCl compliance based upon emissions down stream of control device being 10% or less than upstream emissions;

2. Delete “per ton” in D.1.3(a)(3), last paragraph, third line, after parentheses.

See recommended language provided in attached mark-up of permit language. (Attachment 1)

Response 20:

Condition D.1.3(a)(2) has been revised to include the alternative and Condition D.1.3(a)(3) has had the extra phrase “per ton” deleted as follows:

D.1.3 Secondary Aluminum Smelting Limits [40 CFR Part 63.1500 (Subpart RRR)]

(a) (2) The Permittee shall not discharge or allow to be discharged to the atmosphere any three- (3-) day, twenty-four- (24-) hour rolling average emissions of HCl in excess of:

$$L_{cHCl} = \frac{\sum_{i=1}^{n} \left(L_{tiHcl} x T_{ti} \right)}{\sum_{i=1}^{\wedge} T_{ti}}$$

where L_{tiHCl} = The HCl emission limit for individual emission unit in the secondary aluminum processing unit I in paragraph (i)(4) of 40 CFR 63.1505.

T_{ti} = The feed/charge rate for individual emission unit I; and

L_{cHCl} = The HCl emission limit for secondary aluminum processing unit I.

The HCl emission limit (L_{cHCl}) for a Group 1 furnace without an in-line fluxer (each reverberatory furnace) at a secondary aluminum production facility shall be 0.40 pounds per ton of feed/charge or per ton of aluminum produced. [40 CFR 63.1505 (i)][40 CFR 63.1505(k)] **or ten (10%) percent of the uncontrolled HCl emissions by weight [40 CFR 63.1505 (i)].**

(3) The Permittee shall not discharge or allow to be discharged to the atmosphere any 3-day, 24-hour rolling average emissions of total tetra-, penta-, hexa-, and octa-chlorinated dibenzo dioxins and furans (D/F) in excess of:

$$L_{cDF} = \frac{\sum_{i=1}^{n} \left(L_{tiDF} x T_{ti} \right)}{\sum_{i=1}^{\wedge} T_{ti}}$$

where L_{tiDF} = The D/F emission limit for individual emission unit in the secondary aluminum processing unit; and

T_{ti} = The feed/charge rate for individual emission unit I; and

L_{cDF} = The D/F emission limit for secondary aluminum processing unit.

The D/F emission limit (L_{cDF}) for a Group 1 furnace without an in-line fluxer (aluminum reverberatory smelting furnaces, known as furnaces #1 and #2) at a secondary aluminum production facility shall be 15 micrograms of D/F TEQ per megagram (2.1 x 10^{-4} gr of D/F TEQ per ton) ~~per ton~~ of feed/charge or per ton of aluminum produced. Where TEQ is the toxicity equivalents for dioxins and furans as defined in "Interim Procedures for Estimating Risks Associated with Exposures to Mixtures of Chlorinated Dibenzo-p-Dioxins and -Dibenzofurans (CDDs and CDFs) and 1989 Update". [40 CFR 63.1505(i)][40 CFR 63.1505(k)]

Comment 21:

D.1.6 Operation, Maintenance, and Monitoring (OM&M) Plan

The opening paragraph should be amended to reflect amendments to 40 CFR 63.1510(b) made on September 24, 2002 (67 Fed. Reg. 59792).

See recommended language provided in attached mark-up of permit language. (Attachment 1)

Response 21:

The first paragraph of Condition D.1.6 has been revised to incorporate the changes from the September 24, 2002 amendments as follows:

D.1.6 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR Part 63.1510(b)]

By March 23, 2004, the Permittee shall prepare and implement for each of the ~~aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ ~~for review and approval as part of the application for a Part 70 or Part 71 permit~~. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

Comment 22:

D.1.8 Preventive Maintenance Plan

As drafted improperly extends PMP to operating units. Reword to clarify.

Preventive Maintenance Plans, as defined in 326 IAC 1-6-3, are designed to assure the proper maintenance and functioning of "emission control devices." This permit condition, as drafted, extends the scope of the PMP to the furnaces themselves. It could be read to require the identification and quantification of every replacement nut and bolt in the reverberatory furnaces. This is not authorized by the "applicable requirement." Moreover, the operation of process equipment and replacement of furnace parts are not within IDEM's purview except to the extent that they *affect emissions*. The specific operational parameters that have been determined to affect emissions and are appropriately subject to IDEM oversight are stated elsewhere in the permit. In this vein, we note that even the OM&M Plan, required by the NESHAP, is limited to "process and control device parameters to be monitored *to determine compliance*" and "procedures for the proper operation and maintenance …*to meet the applicable emission limits or standards*…" See 40 CFR 63.15010(b). Once the OM&M Plan is required and becomes effective, the permit provides that the PMP will not apply. At that point, process parameters that affect emissions will be incorporated into OM&M Plan. Until then, IDEM has no authority to expand the scope of the PMP.

Recommended Language:

"A Preventive Maintenance Plan, in accordance with Section B- Preventive Maintenance Plan, of this permit, is required for the aluminum reverberatory smelting furnace baghouse system."

Response 22:

The wording of 326 IAC 1-6-5 clarifies that the PMP includes emission units since the PMP can be changed to reduce excessive malfunctions in combustion and process equipment, as well as control devices. Pursuant to 326 IAC 1-6-5, "The commissioner may consider the following guidance in determining cases of excessive malfunctions. Where records show that repeated malfunctions exceed five percent (5%), as a guideline, of the normal operational time for any one control device or combustion or process equipment, the commissioner may require that the maintenance program be improved or that the defective or faulty equipment (emphasis added) or emission control device be replaced.

The PMP is applicable to emission units and control devices. If lack of proper maintenance could cause or contribute to a violation of any limitation on emissions or potential to emit, then a Preventive Maintenance Plan will be required even if there is no control device. In this case, the IDEM, OAQ has determined that the facilities in question and their control devices require a preventive maintenance plan. The Preventative Maintenance Plan for the furnaces can assure that the emissions are ducted properly, without leakage that bypasses the control device. Furthermore, the PMP can also assure that the combustion processes and residues in the furnaces do not affect the level of emissions. Proper combustion, lack of leakage from the furnaces and proper ducting to the control device minimizes emissions. Therefore, a PMP for both the furnaces and the control devices is appropriate.

Therefore, the wording in Condition D.1.8 has not been changed due to the comment. However the second sentence of Condition D.1.8 has been deleted since Condition B.11 (now B.10) has incorporated language to explain that to the extent that the Operation, Maintenance, and Monitoring (OM&M) Plan is required, it can be used to satisfy the requirements of the PMP for that emission unit.

Condition B.11(now B.10) (Preventive Maintenance Plan) has been revised because it is not necessary to state twice that the PMP does not need to be certified. The statement is more appropriately contained in (c), it has been removed from (a) as follows:

In addition, Condition B.11(b) (now B.10(b)) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in (d) has been moved to D Section(s). Because the general record keeping requirements (i.e., retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition(s). At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so (d) has been added to this condition.

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The ~~PMP and the~~ PMP extension notification do**es** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs, **including any required record keeping,** as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the

"responsible official" as defined by 326 IAC 2-7-1(34).

~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OM&M) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each of the furnaces #1 and #2, and their baghouses. ~~If the OM&M plan required by Condition D.1.6 is developed in accordance with Section B- Preventive Maintenance Plans, then after the OM&M plan has been approved, it shall satisfy the requirements of this condition.~~

Comment 23:

D.1.9 Testing Requirements - (For State Emission Limit Compliance)

Restore the frequency of performance testing to every five years. Also delete requirement to test at 95% or more of maximum design capacity. Also add section clarifying how compliance is to be determined.

Test Frequency

As drafted, this section requires stack tests to be performed on the two smelting furnaces for PM and PM_{10}, every 2.5 years in order to demonstrate compliance with the PSD and process weight rate emission limitations. This condition differs from the previous permit requirement, will require costly additional testing, is more stringent than federal Subpart RRR requirements, and is neither required by an "applicable requirement" nor necessary to demonstrate compliance with an "applicable requirement." Finally, as a factual matter, more frequent testing is not supported by the level of PM or PM-10 that has been emitted historically or will be emitted in the future by this facility.

The 1996 FESOP established the testing frequency necessary to assure compliance with the PSD and process weight rate emission limits. The 1996 FESOP for Tipton requires testing for PM and PM-10 once within the 5 year life of the permit. As the Title V permitting process is not intended to impose new substantive requirements, the frequency of testing in the Title V permit must be the same frequency as in the FESOP unless otherwise required by an "applicable requirement." (See Appalachian Power, ID. at 1026-1027. "We attach significance to EPA's recognition, in its 1992 permit regulations, that 'Title V does not impose substantive new requirements,' 40 CFR 70.1(b). Test methods and the frequency of testing for compliance with emission limitations are surely 'substantive' requirements; they impose duties and obligations on those who are regulated.")

This is not a case where the previously required frequency of testing is insufficient to assure compliance with the terms and conditions of the permit. As an approved FESOP, the 1996 permit and the specified 5 year stack testing frequency were deemed sufficient by both the State and U.S. EPA to assure compliance with the PM and PM-10 emission limits necessary to maintain Title V and PSD minor source status and meet the process weight rate rule. Therefore, the 5 year testing frequency for

this facility has already been found to meet the requirement in 326 IAC 2-7-5(3)(A)((ii) for such periodic monitoring as is "sufficient to yield reliable data from the relevant time period" as well as the requirements in 40 CFR 70.6(c)(1) and 40 CFR 71.6(c)(1) for "testing… sufficient to assure compliance with the terms and conditions of the permit." See U.S. EPA Interim Final Rule, "Revisions to Clarify the Scope of Sufficiency Monitoring Requirements for Federal and State Operating Permit Programs," 67 Fed. Reg. 58524 (9/17/02). Moreover, when, as in this case, the PSD and process weight rate limits are substantially higher than the limits that are required by Subpart RRR, there is no justification for finding that the Subpart RRR periodic testing period (5 years) is "insufficient" to assure reliable data and compliance with these permit terms and conditions. [1]

As a practical matter, there is no need for this increased testing frequency. IDEM may ask for an additional test at any time that it has reason to believe that the facility is not in compliance with applicable emission limitations. But there is no reason to believe that more frequent performance testing on an on-going basis is necessary for this facility to meet state and PSD program required emission limits that are substantially higher than the MACT required emission limits. The Tipton facility is a facility with actual emissions well below Title V "major source" levels for PM and PM-10. Furthermore, because this source will be subject to Subpart RRR MACT requirements, its already low actual PM and PM-10 emissions will be significantly reduced by the time this testing is required. At that point, the Tipton facility will be held to federally required MACT PM emission limits that are much lower than those prescribed by Indiana regulations or the PSD program. The PM-10 emissions, though not subject to a MACT limit, are a function of the PM emissions and will also be reduced. Thus, more frequent testing to assure compliance with less stringent state standards is unnecessary for this facility on a factual basis – regardless of what IDEM's 1997 Internal Policy document suggests about other pre- or non- MACT facilities.

Test Method

This section provides the alternative that the two smelting furnaces be "operated at ninety–five (95%) percent or more of their maximum design capacities" or "under capacities or conditions specified and approved by the IDEM, OAQ" when performing the initial performance test under this permit. The problem is that Wabash plant personnel believe the 95% of design capacity cannot be achieved over the required 3 one hour test periods. There is a difference in the amount of scrap that can be physically processed for a short period of time and that for which processing can be sustained over a longer period. Wabash can perform this initial performance test "at the highest production levels," as required by the NESHAP, and believes this should be deemed sufficient for both the state and federal compliance demonstration.

The alternative of proposing an alternative test method for approval by IDEM doesn't solve the problem – rather it creates an unnecessary burden and uncertainty. Wabash will prepare a Site Specific Test Plan for its MACT testing in the Fall of 2004. That test plan will be designed to comply with the test methods and procedures in the NESHAP and will be based on "operation at the highest production levels." But, for the earlier Title V testing prescribed in this section, Wabash should not be required to develop another test plan, at an earlier date, and live with uncertainty until it is approved. Rather, testing at the capacity which is deemed adequate for NESHAP testing should be deemed adequate

[1] IDEM has indicated to Wabash that the 2.5 years testing frequency is supported by an IDEM 1997 internal policy for testing frequency from certain types of industries and units. Our review of this Internal Policy indicates it does not prescribe a 2.5 year testing frequency for secondary aluminum production reverberatory furnaces or shredders. In any event, as a legal matter, this Internal Policy is not an "applicable requirement" and cannot be the basis for the imposition of more stringent, substantive requirements in a Title V permit. See Appalachian Power v. EPA , 208 F.3d 1015 (D.C. Cir. 2000)

for the Title V testing and so stated in this permit.

Compliance Determination

This section does not clearly indicate how compliance is to be determined. Given the fact that the baghouse system emissions are composed of emissions from both the furnaces and the burners, the separate emission limits for those units which are stated in D.1.1 must be summed in order to determine compliance.

See recommended language in mark-up of proposed permit attached. (Attachment 1.)

In addition, Wabash Alloys supplemented their comments on May 15, 2003 and based on conversations between RMT, Inc. (RMT), on behalf of Wabash Alloys, L.L.C. (Wabash), and Ed Surla in Indiana Department of Environmental Management's (IDEM's) compliance testing section, and is requesting that Wabash be allowed to conduct testing required by the Title V permit and Maximum Achievable Control Technology (MACT) (Subpart RRR) standards prior to the issuance of the final Title V permit. This will allow Wabash to coordinate MACT testing and Title V testing into a single testing event.

Response 23:

See the revision to Condition D.1.1 in response to Comments 13 through 17.

IDEM, OAQ guidance recommends testing every 2.5 years for melting operations. The source can apply to skip one (1) retest cycle provided that they meet the requirements of the Compliance Data Section policy regarding skipping a test. Condition D.1.9 has been revised and allows for testing one (1) year prior to the issuance of the Part 70 Operating Permit as follows:

D.1.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days ~~of permit~~ **after** issuance **of this Part 70 Operating Permit, or up to one (1) year prior to permit issuance,** to demonstrate compliance with Conditions and D.1.1 and D.1.7, the Permittee shall perform PM and PM_{10} testing utilizing methods as approved by the Commissioner for ~~the aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2. Pursuant to 326 IAC 3-6-3(b), when testing ~~the aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, ~~the~~ furnaces #1 and #2 shall be operated at ninety-five (95%) percent or more of their maximum design capacities, or **under** ~~at~~ conditions representative of normal operations or under capacities or conditions specified and approved by the IDEM, OAQ. This test shall be repeated at least once every two and a half (2.5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 24:

D.1.10 Testing Requirements (For NESHAP Emission Limit Compliance)

Delete 2.5 year testing frequency and replace with MACT prescribed 5 year frequency. Also clarify test method to assure consistency with Subpart RRR method. Add a section clarifying how the compliance determination is made.

Test Frequency

Like Section D.1.9 above, this section requires that testing be repeated at least every 2.5 years. Under this section, testing is designed to demonstrate compliance with the Subpart RRR required emission

limit on PM, HCl and D/F, as incorporated by reference in the Indiana regulations. As stated above, this testing frequency is inconsistent with the Subpart RRR NESHAP testing parameters which establish a 5 year testing frequency. [2] As such, the imposition of additional costly testing in this Part 70 permit is beyond the scope of IDEM's authority. See Appalachian Power, Id. It is also inconsistent with the compliance requirements in 326 IAC 2-7-5(3)(A)(i) which states that "….each Part 70 permit shall contain …all emissions monitoring and analysis procedures or test methods required under the applicable requirements…"

This is the quintessential case in which the Title V permit cannot prescribe different periodic monitoring and/or testing requirements. See discussion above for Condition D.1.9. Not only is there an explicit "applicable requirement" for the 5 year testing frequency for purposes of Subpart RRR compliance, there is also no basis in state or federal law or in the facts in this case to find that this testing frequency is insufficient to demonstrate compliance with the Subpart RRR established emission limits.

Test Method

This section states "In order to demonstrate compliance with Condition D.1.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HCl and D/F testing…using methods as approved by the Commissioner, in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR."

This language would appear to imply that the Commissioner has or is going to adopt test methods for this testing. As Subpart RRR establishes specific test methods and procedures for this category of sources this is both unnecessary and beyond the scope of IDEM's authority. [3] 40 CFR 63.1511 states the specific test methods in Appendix A to 40 CFR Part 60 which a owner or operator "must use" in the NESHAP testing. It also provides that "the owner or operator may use an alternative test method, subject to approval by the Administrator." Note that this language indicates that the use of an alternative test method is at the option of the owner or operator and with the approval of the Administrator (or the state permitting authority, in this case.) The language in the permit should be consistent with the NESHAP.

Recommended Language:

Wabash requests that the language in this section be clarified as follows:

> "In order to demonstrate compliance with Condition D.1.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HCl and D/F testing…in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The owner or

---

[2] See 40 CFR 63.1511(e) which states: "The owner or operator of new or existing affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test."

[3] Indiana has not adopted a different MACT standard by rule for secondary aluminum production, but rather is only authorized to implement the federal MACT rule in the Title V permit. The state and federal regulations, EPA's preamble to the regulations, EPA's recent Interim Final Rule and federal case law all make it very clear that where an underlying "applicable requirement" imposes periodic monitoring or testing, the permit must assure the use of "…test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement." See 40 CFR 70.6(a)(3)(i)(A), 326 IAC 2-7-5(3)(A)(i), 57 Fed. Reg. 322250, 32278, 67 Fed. Reg. 58524, and Appalachian Power, Id..

operator may use an alternative test method, subject to the approval of the IDEM, OAQ. "

Compliance Determination

This section does not clearly indicate how compliance is to be determined. Given the fact that the baghouse system emissions are composed of emissions from both the furnaces and the burners, the separate emission limits for those units must be summed in order to determine compliance.

See recommended language in mark-up of proposed permit attached. (Attachment 1.)

In addition, Wabash Alloys supplemented their comments on May 15, 2003 and based on conversations between RMT, Inc. (RMT), on behalf of Wabash Alloys, L.L.C. (Wabash), and Ed Surla in Indiana Department of Environmental Management's (IDEM's) compliance testing section, and is requesting that Wabash be allowed to conduct testing required by the Title V permit and Maximum Achievable Control Technology (MACT) (Subpart RRR) standards prior to the issuance of the final Title V permit. This will allow Wabash to coordinate MACT testing and Title V testing into a single testing event.

Response 24:

Condition D.1.10(a) has been revised to reflect the five (5) year test frequency. The source has an extension to be in compliance with Subpart RRR by March 23, 2004. Therefore, stack testing to verify compliance must be completed by the compliance date and not 180 days after March 23, 2004. Similarly, compliance allows for testing within one (1) year prior to the issuance of the Part 70 Operating Permit. Therefore, the changes to Condition D.1.10 are as follows:

D.1.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63 Subpart RRR]

By ~~September 23, 2004, which is 180 days after~~ the March 23, 2004 compliance date,

(a) In order to demonstrate compliance with Condition D.1.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HC**I**~~L~~ and D/F testing of ~~the north and south baghouse**(s)** on the aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, using methods ~~as approved by the Commissioner,~~ in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. **The Permittee may use an alternative test method subject to the approval of the IDEM, OAQ. Testing may be conducted up to one (1) year prior to permit issuance.** These tests shall be repeated at least once every **five (5)** ~~two and one-half (2.5)~~ years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 25:

Section D.1.11 Particulate Matter (PM) and Capture/Collection Systems

Replace the phrases "two (2) baghouses" and "baghouses" with the phrase "baghouse system."

Both smelting furnaces at Tipton vent to and are controlled by a "baghouse system" which includes two baghouses. "Baghouse system" is the term used in the prior FESOP permit (FESOP No. F159-5547-00008, Condition A.2(1)). Proposed Section D.1.11 would require that both baghouses in the baghouse system, rather than the baghouse system, must be operating at all times that the furnaces are operating. This apparently "semantic" change in the permit language actually improperly characterizes the capture and collection system and results in a substantial change in permitted operation. The two

furnaces at Tipton were designed with common ducting to a "baghouse system" which has two baghouses. The individual furnaces are not tied to individual baghouses. This design allows for continued operation and control of one or more furnaces during a malfunction of either individual baghouse, as was recognized under prior Tipton permit. As written, this new permit language will deny Tipton the benefit of this design by requiring a complete shutdown of operations when one baghouse experiences a malfunction even though operation of the baghouse system is continuing to "control emissions" at the permitted emission limits. This substantive change is not required by any "applicable requirement" and is not authorized under this Title V permitting process.

Wabash is not seeking to operate the baghouse system using only one baghouse as a normal mode of operation, but must have the flexibility to continue operations in situations in which a malfunction requires that one baghouse be taken down. In this situation, the baghouse system will continue to operate and the equipment can be operated in compliance with applicable emission limitations by adjusting the operating parameters, e.g. the volume and type of feed. No permit condition would be violated other than this new requirement that both baghouses be operating at all times.

We note that the Emergency Provisions in Section B.12 of the Proposed Permit would allow the continued operation of the furnaces in an emergency situation that causes "a deviation from a technology based limit" as long as all "reasonable steps are taken to correct the emergency and minimize emissions." The definition of an "Emergency" in 326 IAC 2-7-1(12) is limited to events that cause "the source to exceed an emission limit under a Part 70 permit due to unavoidable increases in emissions attributable to the emergency." Wabash recognizes that it may rely on this provision when a malfunction of the baghouse system causes it to exceed an emission limitation. However, the lesser situation, in which a partial malfunction does not cause the baghouse system as a whole to fail and in which no emission limitation is exceeded should not be required to be treated as an "emergency."

This is not a new idea. It is already contained in Section D.1.23(a) which addresses bag failure in a multi-compartment baghouse. The failure of a single baghouse in a dual baghouse system is analogous to the failure of a single compartment in a multi-compartment baghouse. Under Section D.1.23(a), the "Emergency Provisions" in Section B are to be followed only "if the event qualifies as an emergency;" i.e. if emission limitations are exceeded. Note that it is the redundancy built into the system by both dual baghouses and multi-compartment baghouses at Tipton that allows emission limits to be achieved during a partial failure of the baghouse system.

The focus of this permit should be on emission control regardless of how many baghouses are operating. Emission control can be verified by monitoring operating parameters whether one or two baghouses are operating. The parametric monitoring, visible emissions monitoring, and other compliance monitoring provisions in this permit provide assurance that the equipment cannot be operated in any mode which results in non-compliance with applicable requirements.

Suggested Language:

"(a) In order to comply with Conditions D.1.1 and D.1.7, the baghouse system for PM control shall be in operation and operate to control emissions from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, at all times that the furnaces are in operation."

"(b) On and after March 23, 2004, in order to comply with Conditions D.1.3 and D.1.5, the baghouse system for PM control shall be in operation and operate to control emissions from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, at all times that the furnaces are in operation according to the procedures and

requirements of the OM&M plan."

Response 25:

Condition D.1.11 has been revised to allow the use of the north and/or the south baghouse(s) to show compliance with Conditions D.1.1 (326 IAC 2-2) and D.1.7 (326 IAC 6-3-2) since Wabash Alloys requested a change to the 0.8 pounds per ton of charge and both baghouses operating individually in previous stack tests showed compliance with this emission rate. However, the configuration of baghouses (north and/or the south baghouse(s)) used in the performance test required by Condition D.1.10(a) will then be required to be operated at all times. Therefore, Condition D.1.11 has been revised as follows:

D.1.11 Particulate **Control** ~~Matter (PM)~~ and Capture/Collection Systems [40 CFR 63.1506(c)]

(a) In order to comply with Conditions D.1.1 and D.1.7, the ~~two (2)~~ **north or south** baghouse~~s~~ for **particulate** ~~PM~~ control shall be in operation and control emissions from ~~the aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, at all times that ~~the~~ **either** furnace~~s are~~ **is** in operation.

(b) On and after March 23, 2004, in order to comply with Conditions D.1.3 and D.1.5, the baghouse**(**s**)** for **particulate** ~~PM~~ control **used to demonstrate compliance required by Condition D.1.10(a)** shall be in operation and control emissions from ~~the aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, at all times that the furnaces are in operation according to the procedures and requirements of the OM&M plan.

Comment 26:

D.1.20 Compliance Monitoring Requirements

Revise to comply with NESHAP:

1. Revise introductory paragraph to include new language from 40 CFR 63.1510(a) adopted on September 24, 2002 (67 Fed. Reg. 59792).

2. Delete phrase "and the north and south baghouses" in the third line of the introductory paragraph.

3. Revise Subsection(a)(1) to allow compliance on the basis of weight produced as provided in 40 CFR 63.1510(t)(1).

This provision should incorporate the provisions of 40 CFR 63.1510(t) as recently amended and without change. Also, this provision applies solely to Secondary Aluminum Processing Units ("SAPU") which, in this case, consist solely of furnaces #1 and #2. None of the requirements in this section apply to the baghouse system.

See recommended language provided in attached mark-up of permit. (Attachment 1)

Response 26:

Conditions D.1.20(a) and D.1.20(a)(1) have been revised to be consistent with Subpart RRR as follows:

D.1.20 Compliance Monitoring Requirements [40 CFR 63.1510(t)] [40 CFR 63.1510(u)]

Effective March 23, 2004, p~~P~~ursuant to 40 CFR 63, Subpart RRR, ~~on and after the date the initial~~

~~performance test to show compliance with Condition D.1.10 is required to be completed,~~ the Permittee shall monitor ~~aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, ~~and the north and south baghouses~~ according to the following requirements:

(a) The Permittee shall calculate and record the three- (3-) day, twenty-four (24-) hour rolling average emissions of PM, HCl, and D/F for each furnace on a daily basis. To calculate the three- (3-) day, twenty-four (24-) hour rolling average, the Permittee shall:

(1) Calculate and record the total weight of material charged to each furnace for each twenty-four- (24-) hour day of operation using the feed/charge weight data collected as required under Subpart RRR. **If the Permittee chooses to comply on the basis of the weight of the aluminum produced by the furnaces #1 and #2, rather than the weight of the material charge to the furnaces, all performance test emissions results and all calculations shall be conducted on the aluminum production weight basis.**

Comment 27:

D.1.21 Parametric Monitoring, and
D.2.15 Parametric Monitoring

In Subsection (a), delete Compliance Response Plan requirements.

As discussed in relation to Section C.18 above, Wabash objects to the referenced "Compliance Response Plan" requirement in subsection (a) because it is a new provision, it contains requirements not contained in any prior permits and not specified in 326 IAC 2-7-5, and it is not based on any other "applicable requirement." We note that IDEM regulations do require that owners and operators take "reasonable measures" to correct malfunctions. See 326 IAC 1-6-4. However, these regulations do not require a plan containing the requirements specified in Section C.18 above. Furthermore, 326 IAC 1-6-4 states that emissions temporarily exceeding standards shall not be considered a violation as long as the owner /operator complies with the provisions of 326 IAC 1-6-4(a). The provisions in C.18 and this section are inconsistent with this Indiana regulation, and will subject Wabash to liability for violation of conditions of a plan that are not based on duly adopted "applicable requirements."

Suggested Language for Condition D.1.21:

> "The Permittee shall record the total static pressure drop across the north and south baghouses used in conjunction with the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, at least once per shift when either furnace is in operation. When for any one reading, the pressure drop across the north or south baghouses is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable measures to correct the conditions causing the abnormal pressure drop as expeditiously as possible. A pressure reading that is outside the above mentioned range is not a deviation from this permit."

Response 27:

IDEM, OAQ has decided not to use the recommended wording change. See Responses 1 and 12 regarding the denial of the deletion of Compliance Response Plans. Therefore, no changes in Conditions D.1.21 and D.2.15 are necessary.

Comment 28:

In Conditions D.1.21 and D.2.15 Parametric Monitoring, delete subsection (b) which references the former FESOP requirements which should be in TSD.

There is no need to include references to prior FESOP conditions in the Title V permit and to do so clutters the permit and may be confusing. The permit should simply state the current requirement. Any discussion of the prior permit that may be required should be included in the TSD rather than the permit.

Response 28:

Subsequent to the beginning of the public notice period, IDEM, OAQ has changed its policy and is no longer requiring that conditions that are changed be rescinded in the permit. Therefore, since it was stated in the TSD, Conditions D.1.21(b) and D.2.15(b) have been deleted as follows:

D.1.21 Parametric Monitoring

~~(b) The requirement from FESOP 159-5547-00008, issued on December 9, 1996 and MPR 159-10733-00008, issued on May 14, 1999, Condition D.1.5 stated that the compliance monitoring requirement to maintain the total static pressure drop between 3 and 6 inches. The total static pressure drop has been revised from between 3 and 6 inches to between 2 and 8 inches as requested by Wabash Alloys - Tipton Plant. Thus, Condition D.1.5 of FESOP 159-5547-00008, issued on December 9, 1996 and MPR 159-10733-00008, issued on May 14, 1999 is hereby rescinded.~~

D.2.15 Parametric Monitoring

~~(b) The requirement from FESOP 159-5547-00008, issued on December 9, 1996, Condition D.2.5 stated that the compliance monitoring requirement to maintain the total static pressure drop between 3 and 6 inches. The total static pressure drop has been revised from between 3 and 6 inches to between 2 and 8 inches as requested by Wabash Alloys - Tipton Plant. Thus, Condition D.2.5 of FESOP 159-5547-00008 is hereby rescinded.~~

Comment 29:

D.1.23 Broken or Failed Bag Detection
D.2.17 Broken or Failed Bag Detection

Delete Compliance Response Plan requirements.

See discussion above regarding new Compliance Response Plan requirements in Sections C.18 and D.1.21.

Response 29:

IDEM, OAQ has decided not to use the recommended wording change. See Responses 1 and 12 regarding the denial of the deletion of Compliance Response Plans. Therefore, no changes in Conditions D.1.23 and D.2.17 are necessary.

Comment 30:

D.1.24 Visible Emissions Notations, and
D.2.20 (now D.2.18) Visible Emissions Notations

Replace once per shift visible emissions notations with once per day. Delete Compliance Response Plan requirements.

As written, Subsection D.1.24(a) and D.2.20(a) require that visible emission notations be made “once per shift during normal daylight operations.” Wabash fears that given the hours of its shifts and the change in daylight throughout the year it will be difficult to determine compliance with the condition, e.g. Did the operator correctly determine whether it was or wasn’t “daylight” when a shift straddles the daylight hours? We request a revision to this provision to require visible emission notations once per day. See recommended language in attached mark-up to permit. (Attachment 1)

With regard to unauthorized Compliance Response Plan requirements, see discussion under Sections C.18 and D.1.21 above.

Response 30:

IDEM, OAQ has not changed the frequency of visible emissions to once per day as requested. In the past, the IDEM, OAQ has received complaints from the public regarding visible emissions from this plant. Sunrise and sunset tables are readily available and any shift that includes daylight hours is required to perform at least one (1) observation per shift. This is not an onerous requirement and helps to assure continuous compliance with the Part 70 Operating Permit conditions.

Comment 31:

D.1.26 Secondary Aluminum Production Record Keeping Requirements, and
D.2.22 Secondary Aluminum Production Recordkeeping Requirements

Revise Subsection (d)(1) to accurately reflect NESHAP language:

40 CFR 63.1517((b)(1)(i), which is the source of the language in this subsection is limited by the opening phrase: " If a bag leak detection system is used,…." This language must be included to ensure consistency with the NESHAP.

Response 31:

Conditions D.1.26(d)(1) and D.2.22(d)(1) (now D.2.20(d)(1) have been clarified by adding the phase, "For a bag leak detection system" as follows:

D.1.26 Secondary Aluminum Production Record Keeping Requirements [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1517, the Permittee shall:

(d) In addition to the general records required by 40 CFR 63.1510(b), the Permittee of a furnace with a lime-injected fabric filter shall maintain records of:

(1) **For a bag leak detection system,** ~~T~~**t**he number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

D.2.22 Secondary Aluminum Production Record Keeping Requirements [40 CFR Part 63, Subpart RRR]

Effective March 23, 2004, pursuant to 40 CFR Part 63.1517, the Permittee shall:

(d) In addition to the general records required by 40 CFR 63.1510(b), the Permittee of the ~~scrap aluminum~~ shredder/crusher controlled by ~~a cyclone and~~ a baghouse shall maintain records of:

(1) **For a bag leak detection system,** ~~T~~**t**he number of total operating hours for the affected source or emission unit during each six- (6-) month reporting period, records of each alarm, the time of the alarm, the time corrective action was initiated and completed, and a brief description of the cause of the alarm and the corrective action(s) taken.

Comment 32:

Section D.2 Facility Operation Conditions – Shredder/ Crusher

D.2.1 Prevention of Significant Deterioration
D.2.1(a) PM emissions

The PM emission limit in this section should be changed to 0.980 lbs/ton of feed.

The function of the emission limitation contained in this section is solely to ensure that PM emissions from the shredder/crusher do not exceed the PSD threshold levels. We note that other applicable PM limits are referenced elsewhere in this permit. We further note that the emission limit in this section is not based on the PTE of the shredder/crusher.

Attachment 2 hereto provides calculated annual emissions which demonstrate that an emission limit of 0.980 lbs/ton for the shredder/crusher will ensure that PM emissions from the shredder remain less than 100 tpy.

D.2.1(b) PM_{10} emissions

The PM_{10} emission limit in this section should be changed to 0.980 lbs/ton of feed.

Again, the sole function of the emission limitation contained in this section is to ensure that PM_{10} emissions from the shredder/crusher do not exceed the PSD threshold level. We note that other applicable PM limits are referenced elsewhere in this permit. As stated above, the emission limit in this section is not based on the PTE of the shredder/crusher.

Attachment 2 hereto provides calculated annual emissions which demonstrate that an emission limit of 0.980 lbs/ton for the shredder/crusher will ensure that PM_{10} emissions from the shredder/ crusher stay below the PSD threshold level.

Response 32:

See discussion and changes to Condition D.2.1(a) and (b) for PM and PM_{10} in Responses 13 - 17.

Comment 33:

Insignificant Activities:

Delete the reference to emissions limits for emissions from insignificant sources in this section because these emission limits are established in Section D.1.1.

The insignificant activities for which emission limits are established are for the entire facility and are not related to the shredder. These emissions have been recognized and limited under Section D.1.1 and need not be included here.

Response 33:

Although the limited emissions from insignificant activities are listed in Condition D.1.1, these emission limits for insignificant activities have been restated in Condition D.2.1 to show that the emissions from the shredder/crusher in combination with those emissions render the requirements of 326 IAC 2-2 not

applicable. Therefore, no change to Condition D.2.1 beyond those shown in Responses 13 - 17 are necessary.

Comment 34:

D.2.5 Operation, Maintenance and Monitoring Plan

Delete subsection (e) as inconsistent with Subpart RRR. Also delete references to cyclone.

The determination of feed charge rate is not required by Subpart RRR. As the NESHAP does not regulate shredder/crusher emissions on the basis of throughput, but rather on the 0.01 grains per dry standard cubic foot basis, a procedure for determining charge/feed is neither required nor appropriate in the OM&M plan.

The OM&M applies to process and control devices that affect compliance. The cyclone is a material recovery device and does not generate or control emissions. Therefore, it is not a unit subject to the OM&M plan and references to it in this section should be deleted.

The opening paragraph should be amended to reflect amendments to 40 CFR 63.1510(b) made on September 24, 2002 (67 Fed. Reg. 59792).

Furthermore, Wabash particularly objects to the requirement in this provision that the shredder/ crusher be shut down immediately upon cyclone failure. Since the cyclone does not operate to control regulated pollutants and is not being relied upon to achieve emission limits under this permit, the failure of the cyclone will not affect pollution control or the ability to achieve emission limits. Furthermore, cyclone failure (due to something like a hole in the cyclone casing) will not affect baghouse operation any more than a similar failure in other parts of the process, e.g. in the duct work.

As noted above, many shredders with baghouse control systems operate completely without a cyclone. Applying this “shut down” requirement to those facilities, they should not be allowed to operate at all. This provision penalizes Wabash for having a piece of equipment that others are not required to have and that is not being relied upon to achieve compliance.

Response 34:

Since the cyclone is a material recovery device and does not generate or control emissions Condition A.2(c) and Section D.2.1 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour. **The cyclone is a material recovery device and does not generate or control emissions.**

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Scrap Aluminum Shredder/Crusher

(c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour. **The cyclone is a material recovery device and does not generate or control emissions.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Since the determination of feed charge rate is not required by Subpart RRR for shredders paragraph (e) of Condition D.2.5 has been deleted.

In addition, the opening paragraph of Condition D.2.5 has been revised to reflect the September 24, 2002 Subpart RRR amendment.

Prior to this comment being submitted, Wabash Alloys had not informed IDEM, OAQ that the cyclone was not being used as a control device. Therefore, Conditions D.2.5, D.2.7, D.2.10, D.2.14, D.2.21 (now D.2.19) and D.2.22(c) (now D.2.20(c)) have been revised and made consistent with the Amendment dated September 24, 2002. In addition, Conditions D.2.18 and D.2.19 have been deleted as follows: Also see Response 22 for the revision to Condition B.11 which in turn allows IDEM, OAQ to delete the last sentence of Condition D.2.7.

D.2.5 Operation, Maintenance, and Monitoring (OM&M) Plan [40 CFR Part 63.1510(b)]

By March 23, 2004, the Permittee shall prepare and implement for the ~~scrap aluminum~~ shredder/ crusher a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ ~~for review and approval as part of the application for a Part 70 or Part 71 permit~~. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

(a) Process as well as ~~cyclone and~~ **the** baghouse parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.

(b) A monitoring schedule for the ~~scrap aluminum~~ shredder/crusher.

(c) Procedures for the proper operation and maintenance of the ~~scrap aluminum~~ shredder/ crusher as well as ~~cyclone and~~ **the** baghouse used to meet the applicable emission limits or standards in 40 CFR63.1505.

(d) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(1) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(2) Procedures for the quality control and quality assurance of continuous emission as required by the general provisions in Subpart A of this part.

~~(e) The procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.~~

(**e~~f~~**) Corrective actions to be taken when process or operating parameters ~~or cyclone~~ and baghouse parameters deviate from the value or range established in 40 CFR 63.1510(b)(1), including:

(1) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and

(2) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(**f~~g~~**) A maintenance schedule for the ~~scrap aluminum~~ shredder/crusher as well as its ~~cyclone and~~ baghouse that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the ~~scrap aluminum~~ shredder/crusher and its baghouse ~~and cyclone~~. ~~If the OM&M plan required by Condition D.2.5 is developed in accordance with Section B- Preventive Maintenance Plans, then after the OM&M plan has been approved, it shall satisfy the requirements of this condition.~~

D.2.10 Particulate Matter (PM) and Capture/Collection Systems [40 CFR 63.1506(c)]

(a) In order to comply with Conditions D.2.1 and D.2.6, the ~~cyclone and~~ baghouse for PM control shall be in operation and control emissions from the ~~scrap aluminum~~ shredder/ crusher at all times that the ~~scrap aluminum~~ shredder/crusher is in operation.

(b) On and after March 23, 2004, in order to comply with Conditions D.2.3 and D.2.4, the ~~cyclone and~~ baghouse for PM control shall be in operation and control emissions from the ~~scrap aluminum~~ shredder/crusher at all times that the ~~scrap aluminum~~ shredder/crusher is in operation according to the procedures and requirements of the OM&M plan.

D.2.14 Corrective Action [40 CFR 63.1506(p)]

Effective March 23, 2004, when a process parameter ~~or cyclone~~ or baghouse operating parameter deviates from the value or range established and incorporated in the OM&M plan, the Permittee shall initiate corrective action. The corrective action taken, shall restore operation of the shredder/ crusher as well as its ~~cyclone and~~ baghouse to their normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

In addition, the corrective actions taken shall include follow-up actions necessary to return the process ~~or cyclone~~ or baghouse parameter level(s) to the applicable value or range of values, and steps to prevent the likely recurrence of the cause of a deviation.

~~D.2.18 Cyclone Inspections~~

~~An inspection shall be performed within the last month of each calender quarter of all cyclones controlling the scrap aluminum shredder/crusher.~~

~~D.2.19 Cyclone Failure Detection~~

~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit~~.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.21 Record Keeping Requirements

(a) To document compliance with Condition D.2.15, the Permittee shall maintain records of the total static pressure once per shift during normal operation.

(b) To document compliance with Condition~~s~~ D.2.16 ~~and D.2.18~~, the Permittee shall maintain records of the results of the inspections required under Condition~~s~~ D.2.16 ~~and D.2.18~~.

(c) To document compliance with Condition D.2.**18**~~20~~, the Permittee shall maintain records of visible emission notations of the scrap shredder stack exhaust #4 once per shift.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.22 Secondary Aluminum Production Reporting Requirements [40 CFR Part 63, Subpart RRR]

(c) The Permittee shall develop and implement a written plan that contains specific procedures to be followed for operating and maintaining the shredder/crusher during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process as well as the ~~cyclone and~~ baghouse used to comply with the standard. The Permittee shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan shall include:

(1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and

(2) Corrective actions to be taken in the event of a malfunction of a process or ~~cyclone or~~ baghouse, including procedures for recording the actions taken to correct the malfunction or minimize emissions.

Comment 35:

D.2.7 Preventive Maintenance Plan

As drafted improperly extends PMP to operating units. Reword to clarify.

Preventive Maintenance Plans, as defined in 326 IAC 1-6-3, are designed to assure the proper maintenance and functioning of “emission control devices.” This permit condition, as drafted, extends the scope of the PMP to the shredder and cyclone units. It could be read to require the identification and quantification of every replacement nut and bolt in the shredder or cyclone. This is not authorized by the “applicable requirement.” Moreover, the operation of process equipment and replacement of shredder or cyclone parts are not within IDEM’s purview except to the extent that they affect

emissions. The specific operational parameters that have been determined to affect emissions and are appropriately subject to IDEM oversight are stated elsewhere in the permit. We also note that the OM&M Plan, required by the NESHAP, explicitly identifies areas of process operations that affect emissions and are subject to monitoring and maintenance provisions of that plan. However, in this permit, IDEM cannot expand the scope of the PMP to broadly require inspections of process equipment and inventories of process parts that are beyond the scope of the Indiana regulations and IDEM authority.

Recommended Language:

> "A Preventive Maintenance Plan, in accordance with Section B- Preventive Maintenance Plan, of this permit, is required for the shredder/crusher baghouse system."

Response 35:

The PMP is applicable to emission units and control devices. The wording of 326 IAC 1-6-5 clarifies that the PMP includes emission units since the PMP can be changed to reduce excessive malfunctions in process equipment, as well as control devices. For example, the PMP for the shredder can require inspections of the ducting to the baghouse to make sure that there are no leaks. Therefore, the wording in Condition D.2.7 has not been changed. See response to Comment 22.

Comment 36:

D.2.8 Testing Requirements (for State Emission Limit Compliance)

Delete requirement to test at 95% or more of maximum design capacity.

This section requires the alternative that the shredder/crusher be "operated at ninety-five (95%) percent or more of its maximum design capacity" or "under a capacity … specified and approved by the IDEM, OAQ" when performing the initial performance test under this permit. The problem is that Wabash plant personnel believe the 95% of design capacity may not be achievable over the required 3 hour test period, as the facility does not operate at this level. Wabash can perform this initial performance test "at the highest production levels," as required by the NESHAP.

The alternative of proposing an alternative test method for approval by IDEM doesn't solve the problem – rather it creates an unnecessary burden and uncertainty. Wabash will prepare a Site Specific Test Plan for its MACT testing in the Fall of 2004. That test plan will be designed to comply with the test methods and procedures in the NESHAP and will be based on "operation at the highest production levels." But, for the earlier Title V testing prescribed in this section, Wabash should not be required to develop another test plan, at an earlier date, and live with uncertainty until it is approved. Rather, testing at the capacity which is deemed adequate for NESHAP testing should be deemed adequate for the Title V testing and so stated in this permit.

Response 36:

Condition D.2.8 has been revised to incorporate the change in specifying the capacity under which the test is to be conducted as follows:

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 180 days ~~of permit~~ **after** issuance **of this Part 70 Operating Permit,** to demonstrate compliance with Conditions D.2.1 and D.2.6, the Permittee shall perform PM and PM_{10} testing utilizing

methods as approved by the Commissioner for the ~~scrap aluminum~~ shredder/crusher. Pursuant to 326 IAC 3-6-3(b), when testing the ~~scrap aluminum~~ shredder/crusher **the operation** shall be operated at ninety-five (95%) percent or more of their maximum design capacity, ~~at~~ **under** conditions representative of normal operations, or under a capacity or conditions specified and approved by the IDEM, OAQ. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 37:

D.2.9 Testing Requirements (For NESHAP Emission Limit Compliance)

Delete 2.5 year testing frequency and replace with NESHAP prescribed 5 year frequency. Also clarify test method to assure consistency with Subpart RRR method.

Test Frequency

Like Section D.1.9 and D.1.10 above, this section requires that testing be repeated at least every 2.5 years. Under this section, testing is designed to demonstrate compliance with the Subpart RRR required emission limit on PM, HCl and D/F, as incorporated by reference in the Indiana regulations. As stated above, this testing frequency is inconsistent with the Subpart RRR NESHAP testing parameters which establish a 5 year testing frequency. [4] As such, the imposition of additional costly testing in this Part 70 permit is beyond the scope of IDEM's authority. See Appalachian Power, Id. It is also inconsistent with the compliance requirements in 326 IAC 2-7-5(3)(A)(i) which states that "….each Part 70 permit shall contain …all emissions monitoring and analysis procedures or test methods required under the applicable requirements…"

This is the quintessential case in which the Title V permit cannot prescribe different periodic monitoring and/or testing requirements. See discussion above for Condition D.1.9 and D.1.10. Not only is there an explicit "applicable requirement" for the 5 year testing frequency for purposes of Subpart RRR compliance, there is also no basis in state or federal law or in the facts in this case to find that this testing frequency is insufficient to demonstrate compliance with the Subpart RRR established emission limits.

Test Method

This section states "In order to demonstrate compliance with Condition D.2.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HCl and D/F testing…using methods as approved by the Commissioner, in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR."

This language would appear to imply that the Commissioner has or is going to adopt test methods for this testing. As Subpart RRR establishes specific test methods and procedures for this category of sources this is both unnecessary and beyond the scope of IDEM's authority. [5] 40 CFR 63.1511 states

---

[4] See 40 CFR 63.1511(e) which states: "The owner or operator of new or existing affected sources and emission units located at secondary aluminum production facilities that are major sources must conduct a performance test every 5 years following the initial performance test."

[5] Indiana has not adopted a different MACT standard by rule for secondary aluminum production, but rather is only authorized to implement the federal MACT rule in the Title V permit. The state and federal regulations, EPA's preamble to the regulations, EPA's recent Interim Final Rule and federal case law all make it very clear that where an underlying "applicable requirement" imposes periodic monitoring or testing, the permit must assure the use of "…test methods, units, averaging periods, and other statistical conventions consistent with the applicable

the specific test methods in Appendix A to 40 CFR Part 60 which a owner or operator "must use" in the NESHAP testing. It also provides that "the owner or operator may use an alternative test method, subject to approval by the Administrator." Note that this language indicates that the use of an alternative test method is at the option of the owner or operator and with the approval of the Administrator (or the state permitting authority, in this case.) The language in the permit should be made consistent with the NESHAP.

Recommended Language: Wabash requests that the language in this section be clarified as follows:

> "In order to demonstrate compliance with Condition D.2.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM, HCl and D/F testing…in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. The owner or operator may use an alternative test method, subject to the approval of the IDEM, OAQ."

Response 37:

IDEM, OAQ guidance suggests testing every five (5) years for crushing operations. The shredder/crusher was last stack tested on December 3, 1998. The source has an extension to be in compliance with Subpart RRR by March 23, 2004. Therefore, stack testing to verify compliance must be completed by the compliance date and not 180 days after March 23, 2004. Therefore, Condition D.2.9(a) has been revised as follows:

D.2.9 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63 Subpart RRR]

By ~~September 23, 2004, which is 180 days after~~ the March 23, 2004 compliance date,

(a) In order to demonstrate compliance with Condition D.2.3 and 40 CFR Part 63 Subpart RRR, the Permittee shall perform PM testing of the ~~cyclone/~~baghouse stack exhaust on the ~~scrap aluminum~~ shredder/crusher using methods ~~as approved by the Commissioner~~, in accordance with the requirements in 40 CFR 63, Subpart A and 40 CFR 63, Subpart RRR. **The owner or operator may use an alternative test method, subject to the approval of the IDEM, OAQ.** These tests shall be repeated at least once every ~~two and one-half~~ **five** ~~(2.5)~~ **(5)** years. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 38:

D.2.10 Particulate Matter and Capture/Collection Systems

Delete requirement that cyclone be operating at all times: No applicable requirement for cyclone operation.

The cyclone is not a pollution control device which is relied upon to reduce regulated pollutants or achieve the emission limits in this permit. Rather, it is a material recovery device that operates to recover pieces of scrap which are recycled. Wabash notes that many shredders with baghouses do not include cyclones. Thus, this is simply a piece of process equipment that neither contributes regulated pollutants nor acts as pollution control.

---

requirement." See 40 CFR 70.6(a)(3)(i)(A), 326 IAC 2-7-5(3)(A)(i), 57 Fed. Reg. 322250, 32278, 67 Fed. Reg. 58524, and Appalachian Power, Id.

This condition was not contained in the 1996 FESOP and is not required by any IDEM regulation. Wabash requests that IDEM delete this condition, as well as conditions D.2.18 and D.2.19, because there is no “applicable requirement” requiring operation of the cyclone.

Response 38:

See Response 34.

Comment 39:

Technical Support Document - General Comments:

Incorporate changes in TSD to reflect comments Wabash has made above on the permit.

Wabash requests that IDEM review and amend the TSD based on the comments Wabash has provided on the permit itself, above.

Specific Comments:

P.1 –2 – Permitted Emission Units and Pollution Control Equipment

Amend descriptions of equipment per Wabash comments on permit.

P.4 – Discussion of Existing Approvals

Amend references to revised emission limitations to reflect PSD emission limits contained in Wabash's comments on the permit above.

P. 5 – Enforcement Issues

Delete: No pending enforcement issues.

This section can be deleted as the referenced enforcement issues have been resolved.

P.6 – Emission Calculations

Amend to reflect revised PSD emission limitations discussed in Wabash's comments on the permit above.

P.7-8 -- Unrestricted Potential Emissions

Delete: Unnecessary and potentially inaccurate.

The unrestricted emissions reflected in this table are based upon estimates that cannot be verified. Furthermore, it is unnecessary to enumerate unrestricted emissions as the regulated units at this facility were designed and constructed with baghouse systems controlling emissions. The unrestricted emissions do not reflect the facility's "potential to emit."

P.8 - Potential to Emit After Issuance

Amend to reflect PTE based on physical and operational design of the regulated units and insignificant activities. See PTE estimates previously provided to IDEM for the regulated units and Attachment 4 hereto which contains estimated insignificant and/or trivial emissions estimate. Note that the PSD emission limits for this plant which have been established to ensure PSD minor source status are set at a level which is acknowledged to be higher than the PTE of the regulated units. We note that the fact that an emission limitation has been accepted for PSD purposes does not convert that limit to the unit's PTE unless it is necessary to restrict that unit to less than its physical or operational design. In this case, the physical and operational design of the furnaces and shredder, as well as the operational requirements of the FESOP and the proposed Title V permit, incorporate baghouse

systems which reduce emissions to below the established PSD emission limits.

P.11 – Paraphrasing of NESHAP Standards

The NESHAP standards should be cited, but not paraphrased.

As stated above, Wabash objects to the paraphrasing of the NESHAP requirements in the permit and in the TSD. We note that Indiana has incorporated the federal Secondary Aluminum NESHAP standards by reference rather than adopting a separate and different set of standards. Therefore, restating the requirements in the permit and the TSD is unnecessary. To do so runs the risk that the paraphrasing will misstate the federally applicable requirements and mislead those interpreting the permit in the future. In fact, Wabash found a number of errors in the proposed permit in sections that should precisely reflect the federal standards. One of the problems discovered was the failure of the proposed permit language to reflect recently adopted amendments to the federal Secondary Aluminum NESHAP. By restating the federal NESHAP requirements in the permit, IDEM is creating a permit that will become outdated due to amendments to the federal regulations. Wabash requests that the permit and the TSD incorporate the federal regulations by reference rather than restate the regulatory provisions.

P. 13- 17 – State Rule Applicability - P. 13 – Fugitive Dust Plan discussion

Delete provisions of current plan and replace with reference to plan as it may be amended in the future.

See discussion under C.6 of the proposed permit above.

P. 14 - 15 – State Rule Applicability - Individual Facilities

Amend PSD section to reflect the emission limits contained in Wabash's comments on the permit above.

P. 17 – State Rule Applicability – Insignificant Activities

Delete discussion of application of process weight rate rule to material loading/unloading.

This rule is not applicable to material loading/unloading. See discussion under Wabash's comments on A.3 of the proposed permit above.

P. 17 – 19 – Testing Requirements

Amend to reflect emission limits and testing frequency, methods and procedures in accordance with Wabash's comments on permit.

P. 19 – 30 – Compliance Requirements

Delete everything after first two paragraphs on p. 19 and all of pages 20-30.

Beginning on page 19 and continuing for 11 more pages the TSD appears to reiterate the compliance provisions in the permit. Wabash objects to this restatement of the requirements as unnecessary, misleading and prone to error. Wabash further incorporates herein for all of the restated provisions all of the objections and comments made above in relation to the permit itself.

Response 39:

The Addendum to the Technical Support Document lists and explains all changes to the permit and justification for those changes, and therefore IDEM, OAQ does not update the original Technical Support Document. The Technical Support Document provided the basis for the proposed permit.

Upon further review, the OAQ has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Section B

Change 1:

The general provisions; term of permit rule cite was added to Condition B.2 (Permit Term). In order to avoid confusion for future renewals as to what is the "original" date, IDEM, OAQ is referring to, the following change has been made:

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date **of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

Change 2:

The duty to supplement an application is not an ongoing requirement after the Part 70 Operating Permit is issued; therefore, Condition B.7(a) has been deleted and the condition title has been changed accordingly.

Since Condition B.7(c) (Duty to Supplement and Provide Information) already addresses confidentiality, the last sentence of (b) was revised to remove the statement about confidential information and (c) was updated for clarity as follows:

B.7 Duty to ~~Supplement and~~ Provide Information ~~[326 IAC 2-7-4(b)]~~ [326 IAC 2-7-5(6)(E)] ~~[326 IAC 2-7-6(6)]~~

~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

~~Indiana Department of Environmental Management~~
~~Permits Branch, Office of Air Quality~~
~~100 North Senate Avenue, P. O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(b)~~**(a)** The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined

by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit~~. or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~

~~(c)~~**(b) For information furnished by the Permittee to IDEM, OAQ,** ~~T~~the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

Change 3:

Condition B.8 has been deleted and all subsequent B Conditions have been re-numbered. The language from Condition B.8 has been incorporated on the front page of the permit as follows:

~~B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]~~

~~(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:~~

~~(1) Enforcement action;~~

~~(2) Permit termination, revocation and reissuance, or modification; or~~

~~(3) Denial of a permit renewal application.~~

~~(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.~~

~~(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.~~

~~(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.~~

And on the front page:

Wabash Alloys, L.L.C.
841 South 550 West
Tipton, Indiana 46072

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with

any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. **This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.**

Change 4:

The requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report has been moved from Condition B.15 to Condition B.12 (now B.11). Condition B.12(e) (now B.11(e)) Emergency Provisions has been revised to correct the rule cite and Condition B.12(h) (now B.11(h)) has been added as follows:

B.11~~2~~ Emergency Provisions [326 IAC 2-7-16]

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(~~10~~**9**) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

Change 5:

Condition B.13(g) (now B.12(g) (Permit Shield) has been revised to correct the rule cite as follows:

B.12~~3~~ Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(~~7~~)**(8)**]

Change 6:

Condition B.15(c) (now B.14(c)) (Deviations from Permit Requirements and Conditions) has been

deleted and was incorporated in Condition B.12(h) (now B.11(h)) (Emergency Provisions) as follows:

B.14~~5~~ Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

Change 7:

In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a non-road engine, (d) has been added to Condition B.18 (now B.17) Permit Amendment or Modification.

B.17~~8~~ Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

Change 8:

In order to be consistent with 326 IAC 2-7-20(a)(4), the rule cite in Condition B.20(a)(5) (now B.19(a)(5)) has been revised as follows:

B.**19**~~20~~ Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)**(1)**, (c)(1), and (e)(2).

Change 9:

Condition B.21 (now B.20) (Source Modification Requirement) was revised as follows:

B.2**0**~~1~~ Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by **the requirements of** 326 IAC 2 and 326

IAC 2-7-10.5.

Change 10:

For clarity, an additional rule cites have been added to Condition B.22 (now B.21) Inspection and Entry.

B.2~~1~~2 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] **[IC 13-30-3-1]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy any records that must be kept under the conditions of this permit;

(c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~Inspect~~ any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1,utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Change 11:

326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to Condition B.24 (now B.23). Also, the section and phone number of who the Permittee can contact has been corrected in (c) as follows:

B.2~~3~~4 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] **[326 IAC 2-1.1-7]**

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230**(ask for OAQ, ~~Technical Support and Modeling Section~~ **I/M & Billing Section)**, to determine the appropriate permit fee.

Section C

Change 12:

Condition C.1 has been updated to be consistent with the rule revision of 326 IAC 6-3-2 as follows:

C.1 Particulate~~ Matter~~ Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour **[40 CFR 52 Subpart P]** [326 IAC 6-3-2~~(c)~~]

(a) Pursuant to ~~326 IAC 6-3-2(c)~~ **40 CFR 52 Subpart P**, the ~~allowable~~ particulate matter

emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

Change 13:

Condition C.9 Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable and Condition C.9(e) has been revised to correct a rule cite.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-~~4~~**1**, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

~~(f)~~**(g)** Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable**.

Change 14:

Prior to the Notice of 30-Day Period for Public Comment beginning on August 30, 2002, IDEM, OAQ had issued two (2) Agreed Orders in response to Notices of Violations (NOV) discussed in the Technical Support Document. NOV, No. 2000-9527-A, was issued on February 15, 2001 and NOV, No. 2001-10521-A, was issued on July 19, 2001.

A summary of the NOVs has been abstracted from the Technical Support Document. In addition, a summary of the most recent NOV issued after the Notice of 30-Day Period for Public Comment ended on September 30, 2002 follows:

(a) Notice of Violation, No. 2000-9527-A, issued February 15, 2001

Designated representatives of the IDEM conducted an inspection of the source on May 23 and July 3, 2000. In the first inspection, the source was alleged to have violated four (4) permit conditions, Conditions C.11, D.1.5, D.2.1 and D.2.5 of their FESOP. Wabash Alloys is alleged to have failed to take corrective action when the pressure drop across the baghouses controlling emissions from the furnaces and shredder/crusher were outside the normal operating range. Wabash Alloys is alleged to not have operated the baghouse for the shredder crusher at all times.

(b) Notice of Violation, No. 2001-10521-A, issued July 19, 2001

Designated representatives of the IDEM conducted a second inspection of the source on May 17, 2001 and alleged that a different permit condition was violated. The condition requiring compliance with 326 IAC 6-4-2 is alleged to have been violated by Wabash Alloys allowing

fugitive emissions, (i.e., those not emitted through a vent or stack), to cross property lines at ground level. 326 IAC 6-4-2 is not federally enforceable.

(c) Notice of Violation No. 2002-12064-A, issued March 14, 2003

Designated representatives of the IDEM conducted a third inspection of the source between May 10 and July 24, 2002 and alleged that Conditions C.11 and D.2.5 previously cited in NOV No. 2000-9527-A were allegedly violated again.

In order to resolve the above Notices of Violations, Wabash Alloys entered into the following Agreed Orders:

(d) Agreed Orders Case Nos. 2000-9527-A and 2001-10521-A signed on July 27, 2002

Agreed Orders Case Nos. 2000-9527-A and 2001-10521-A were signed on July 27, 2002 and required that within thirty (30) days of the effective date of the Agreed Order, the Permittee shall develop and submit to IDEM a standard operating procedure (SOP) requiring that smelting/production cease as soon as possible in the event that pollution control equipment ceases operation. The SOP shall require a mandatory check by operating personnel in such event that the pollution control equipment has resumed operation as required under the permit before smelting/production resumes, detailing the specific steps operating personnel must take to confirm normal operation of the pollution control equipment. The SOP shall clearly require that smelting/production equipment may not operate without control equipment operating as required under the permit. The Permittee may not modify the SOP from the version submitted to IDEM without the express written consent of IDEM. IDEM has the sole authority to approve or deny modifications to the SOP.

Within sixty (60) days of the effective date of this Agreed Order, the Permittee shall provide each operator with a copy of the SOP, and train them on its contents. The Permittee shall post the SOP in the production office, where it shall remain posted during the duration of this Agreed Order until July 27, 2005. Respondent shall send copies of the SOP to Mr. Richard Sekula with the OAQ and Mr. Michael Stonik with the Office of Enforcement.

As a result of the aforementioned Agreed Orders, the following condition has been added to the proposed permit in as Condition C.10 in the Emission Limitations and Standards subsection for the entire source to incorporate the requirements as follows and renumbering all subsequent C conditions:

C.10 Standard Operating Procedure (SOP)

(a) The Permittee:

(1) submitted a standard operating procedure (SOP) in August 2002,

(2) may not modify the SOP from the version submitted to IDEM without the express written consent of IDEM. IDEM has the sole authority to approve or deny modifications to the SOP,

(3) shall provide each operator with a copy of the SOP, and train them on its contents, and

(4) shall post the SOP in the production office, where it shall remain posted until

July 27, 2005.

(b) The Permittee shall comply with the following items of the SOP:

(1) Production equipment (furnaces and crusher) cannot be operated when the associated baghouse system is not operating. A furnace or crusher cannot be charged unless the baghouse system that collects the smoke or dust from that equipment is operating.

(2) If any personnel suspects that the baghouse system is not operating, the Production Supervisor or Maintenance Supervisor or such other person with operational authority should be contacted as soon as possible.

(3) As soon as possible after discovering that the baghouse system is not operating for any reason, including a power outage or equipment malfunction, the Equipment Operator must stop charging the equipment.

(4) Charging of the affected equipment must not restart until after the Production Supervisor or Maintenance Supervisor or such other person with operational authority confirms that the baghouse system has restarted and orders the Equipment Operator to restart charging.

(5) To confirm that the baghouse system has restarted, the Production Supervisor or Maintenance Personnel or such other person with operational authority shall visually inspect the baghouse differential pressure gauge and the fan drive.

(6) Any questions regarding the Standard Operating Procedure should be directed to the Production Supervisor or Environmental Manager.

(e) Agreed Order Case No. 2002-12064-A signed on August 6, 2003

Agreed Order Case No. 2002-12064-A was signed on August 6, 2003 and Wabash Alloys was assessed a civil penalty of ten thousand three hundred twelve dollars and fifty cents ($10,312.50).

Change 15:

The following was added to Condition C.11 (now C.12) (Compliance Requirements) to state what IDEM, OAQ does when stack testing, monitoring, or reporting is required to assure compliance with applicable requirements as follows:

C.~~11~~**12** Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements **by issuing an order under 326 IAC 2-1.1-11.** Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Change 16:

Condition C.17 (now C.18) Risk Management Plan has been revised so that it is more straightforward,

and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.~~17~~**18** Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68~~.215~~]

If a regulated substance, ~~subject to~~ **as defined in** 40 CFR 68~~,~~ is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the source must comply with the applicable requirements of 40 CFR 68**.

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).~~

~~All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

Change 17:

Some sources are required to have an Operation, Maintenance and Monitoring (OMM) Plan or Start-up, Shutdown, and Malfunction (SSM) Plan. Instead of having an additional plan, it has been determined that having an OMM Plan can satisfy the requirements for having a CRP. If a source is required to have an SSM Plan, a Parametric Monitoring Plan would also be required to satisfy the requirements to have a CRP. Additional language has been added for these options. Failure to take reasonable response steps shall be considered a deviation of the permit; therefore, (b)(4) was revised. Language was added to (e) to clarify that the records that need to be kept are those instances when, in accordance with Section D, response steps are taken.

In addition, Condition C.18(c)(3) (now C.19(c)(3)) has been revised since the notification requirement has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements as follows:

C.~~18~~**19** Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **If a Permittee is required to have an Operation, Maintenance and Monitoring (OM&M) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.** A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OM&M) Plan** and the Permittee documents such response in

accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan** to include such response steps taken.

The OM&M Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OM&M) Plan**; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan **or Operation, Maintenance and Monitoring (OM&M) Plan** is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Change 18:

In order to clarify which documents need to be certified by the responsible official, the following update has been made to Condition C.19 (now C.20):

C.~~19~~**20** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Change 19:

Condition C.20(a) (now C.21(a)) Emission Statement has been updated to include the specific rule cite that defines the regulated pollutants being referred to in this condition.

C.~~20~~**21** Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

(1) Indicate estimated actual emissions of criteria pollutants from the source;

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1**(32)**~~),~~ **"Regulated pollutant which is used only for purposes of Section 19 of this rule")** from the source, for purposes of Part 70 fee assessment.

Change 20:

Condition C.21 (now C.22) has been revised since it is acceptable for records to be electronically accessible instead of being physically present at a source:

C.~~21~~**22** General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be ~~kept~~ **physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

Change 21:

Conditions D.1.12 and D.1.13 have been revised to clarified that the condition applies on and after the March 23, 2004 compliance date as follows:

D.1.12 Feed/Charge Determination [40 CFR 63.1506(d)]

On and after ~~By~~ March 23, 2004, pursuant to 40 CFR 63.1506, the Permittee shall install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test.

D.1.13 Fabric Filter Monitoring Requirements [40 CFR 63.1510(f)]

On and after ~~By~~ March 23, 2004, the following requirements apply to each of the furnaces #1 and #2:

Change 22:

Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit rather than a violation of this permit. Therefore, Conditions D.1.21, D.1.24(e), D.2.15 and D.2.18(e) have been revised as follows and Conditions D.1.23 and D.2.17 (Broken or Failed Bag Detection) have been changed in Change 25:

D.1.21 Parametric Monitoring

The Permittee shall record the total static pressure drop across the north and south baghouses used in conjunction with furnaces #1 and #2, at least once per shift when either furnace is in operation. When for any one reading, the pressure drop across the north or south baghouses is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a **deviation from** ~~violation of~~ this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.2.15 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shredder/crusher at least once per shift when the shredder/crusher is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a **deviation from** ~~violation of~~ this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.24 Visible Emissions Notations

D.2.18 Visible Emissions Notations

(e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a **deviation from** ~~violation of~~ this permit.

Change 23:

The quarterly inspection do not need to be conducted in the last month of the quarter, but they should not occur in consecutive months. The spelling of calendar has been corrected in Conditions D.1.22 and D.2.16 as follows:

D.1.22 Baghouse Inspections

An inspection shall be performed ~~within the last month of~~ each calend**a**~~e~~r quarter of all bags controlling ~~the aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2. **Inspections required by this condition shall not be performed in consecutive months**. All defective bags shall be replaced.

D.2.16 Baghouse Inspections

An inspection shall be performed ~~within the last month of~~ each calend**a**~~e~~r quarter of all bags controlling the ~~scrap aluminum~~ shredder/crusher. **Inspections required by this condition shall not be performed in consecutive months**. All defective bags shall be replaced.

Change 24:

Previously, the terms “particulate” and “particulate matter” were both used in the 326 IAC 6-3, but revisions were made to the rule which became effective on June 12, 2002 that included using the term “particulate” consistently in 326 IAC 6-3.

D.1.7 Particulate ~~Matter (PM)~~ [326 IAC 6-3-**2**]

Pursuant to 326 IAC 6-3-2 (Particulate **E**~~e~~mission **L**~~l~~imitations **for Manufacturing Processes**~~, work practices, and control technologies~~), the **allowable** particulate ~~matter (PM)~~ emission~~s~~ **rate** from each of the ~~aluminum reverberatory smelting furnaces, known as~~ furnaces #1 and #2, shall not exceed 19.1 pounds per hour each when operating at a process weight rate of 9.95 tons of per hour each.

D.2.6 Particulate ~~Matter (PM)~~ [326 IAC 6-3**-2**]

Pursuant to 326 IAC 6-3-2 (Particulate **E**~~e~~mission **L**~~l~~imitations **for Manufacturing Processes**~~, work practices, and control technologies~~), the **allowable** particulate ~~matter (PM)~~ emission~~s~~ **rate** from the ~~scrap aluminum~~ shredder/crusher shall not exceed 33.5 pounds per hour when operating at a process weight rate of 23.0 tons of per hour.

D.2.10 Particulate **Control** ~~Matter (PM)~~ and Capture/Collection Systems [40 CFR 63.1506(c)]

(a) In order to comply with Conditions D.2.1 and D.2.6, the ~~cyclone and~~ baghouse for **particulate** ~~PM~~ control shall be in operation and control emissions from the ~~scrap aluminum~~ shredder/ crusher at all times that the ~~scrap aluminum~~ shredder/crusher is in operation.

(b) On and after March 23, 2004, in order to comply with Conditions D.2.3 and D.2.4, the ~~cyclone and~~ baghouse for **particulate** ~~PM~~ control shall be in operation and control emissions from the ~~scrap aluminum~~ shredder/crusher at all times that the ~~scrap aluminum~~ shredder/crusher is in operation according to the procedures and requirements of the OM&M plan.

D.3.3 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2] ~~[40 CFR 52 Subpart P]~~

Pursuant to 326 IAC 6-3-2 **(Particulate Emission Limitations for Manufacturing Processes**) ~~and 40 CFR 52 Subpart P,~~ the **allowable particulate emission rate** ~~PM~~ from the material loading/ unloading - operations **and the ladle cleaning and repair operations** shall not exceed the pound per hour emission rate established as E in the following formula:

Change 25:

Additional information was added to Conditions D.1.23 and D.2.17 (Broken or Failed Bag Detection) to describe when a failed unit will be shut down as follows. Also see Change 22.

D.1.23 Broken or Failed Bag Detection

D.2.17 Broken or Failed Bag Detection

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. ~~Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions).~~ Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a **deviation from** ~~violation of~~ this permit. **If operations continue after bag failure is observed and it will be ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

(b) For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then** failed

units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Change 26:

Conditions D.1.25(a) and D.2.19(a) have been added to require records to maintained since the requirement has been removed from Condition B.11 as follows:

D.1.25 Record Keeping Requirements

(a) To document compliance with Condition D.1.8, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

D.2.19 Record Keeping Requirements

(a) To document compliance with Condition D.2.7, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

Change 27:

Condition D.3.2 for cold cleaner degreasing operations had the contents of the first paragraph rearranged to make it easier to understand in Condition D.3.2 as follows:

D.3.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), ~~the Permittee of a~~ **for** cold cleaner degreaser **operations** without remote solvent reservoirs constructed after July 1, 1990, **the Permittee** shall ensure that the following **control equipment** requirements are met:

Reports

Change 28:

The first box on the Emergency Occurrence Report form was revised to include the word “working” in order to be consistent with 326 IAC 2-7-16(b)(5) and the Emergency Provision.

This form consists of 2 pages Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) **working** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

On September 13, 2002, John and Jane Reid, residents of Tipton, submitted comments on the proposed Part 70 Operating Permit. On September 13, 2002, Richard Johnson, and Bret and Melissa Glaze, also residents of Tipton, submitted comments on the proposed Part 70 Operating Permit. On September 26, 2002, Mark Simmons, resident of Tipton, and Thomas and Diana Smith, residents of Sharpsville, submitted comments. A summary of the comments are as follows: The permit language, if changed, has deleted

language as ~~strikeouts~~ and new language **bolded.**

Written Comment from the Public:

Paul, I would like to know what changes have been made to the Part 70 Permit for Wabash Alloys. So I would like to request an additional hearing on this matter. Also, at our previous hearing you declined a request to conduct a baseline environmental study of the area. This study would have been used to determine if pollution was occurring over time. The study could have been helpful to both area residents and Wabash Allows. Since it is evident you rejected the environmental study, I'm requesting your refusal in writing. In addition, I would like to know how many permits for Tipton County have been rejected by IDEM in the last 5 years?

Richard Johnson, 5598 W. State Road 28, Tipton, Indiana 46072
Bret & Melissa Glaze, 5923 W. Division Road, Tipton, Indiana 46072
Mark Simmons, 1322 S. 500 W., Tipton, Indiana 46072
Thomas & Diana Smith, 2341 N. U.S. Highway 31, Sharpsville, Indiana 46068

Response to Written Comment:

Prior to the issuance of the Part 70 Permit, Wabash Alloys - Tipton Plant has been operating under their Federally Enforceable State Operating Permit (FESOP) issued at the end of 1996. The Part 70 Permit differs from the FESOP in two general areas. The emission limitations in the FESOP were based on the U.S. EPA-approved methods to estimate emissions of Hazardous Air Pollutants (HAPs) from secondary aluminum plants that were in place at that time. These methods have been revised to result in a higher emission estimate per unit of production. The change in methodology led Wabash Alloys to apply for a Part 70 Operating Permit rather than renewing their FESOP.

Because Wabash Alloys no longer wishes to be limited as a minor source under Part 70, they have requested that HAPs emissions no longer be limited to less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year for the combination of all HAPs. The Part 70 permit does not allow for any increase in production at Wabash Alloys.

The Part 70 Permit also incorporates new emission limitations for particulate matter (PM), hydrochloirc acid (HCl), and dioxinx & furans (D/F) imposed by the applicable National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subpart RRR and the associated methods for determining compliance, monitoring, record keeping, and reporting.

As stated in the Technical Support Document, IDEM, OAQ has approved and issued the following three (3) permits to Wabash Alloys beginning with the 1996 FESOP:

(a) FESOP 159-5547-00008, issued on December 9, 1996

(b) MPR 159-10733-00008, issued May 14, 1999; and

(c) SSM 159-14206-00008, issued on January 30, 2002.

A public hearing was held on October 22, 2001 on the most recent permit, SSM 159-14206-00008, and all issues raised at that hearing were formally addressed in the Addendum to the Technical Support Document. One of those issues was the question of why there was no environmental impact study don in association with that permit (Comment and Response 59). The OAQ responded by stating that

environmental impact studies are required for projects receiving certain types of government funds and that Wabash Alloys did not receive government funding for this project. The State Implementation Plan (SIP) showed that the area met all applicable National Ambient Air Quality Standards (NAAQS). The SIP's new source review programs do require air quality analyses for new major sources and major modifications of existing major sources. While Wabash Alloys is considered a major source for the Part 70 and Part 63 programs, it is not a major source under the New Source Review programs. The OAQ did an additional analysis of lead emissions and demonstrated that Wabash Alloys does not cause or contribute to any violation of the NAAQS for lead. As air quality planning develops with respect to the new 8 hour Ozone and PM 2.5 NAAQS there may be additional studies done by OAQ to support a revision of the SIP to address those standards.

Since January 1, 1997, the OAQ has made 19 final permit decisions of various types in Tipton County. None of these decisions were denials.

Public Hearing

The Office of Air Quality (OAQ) had a notice published in the February 24, 2003 edition of the Tipton County Tribune, Tipton, Indiana, stating that a public hearing will be held on March 25, 2003, at 6:00 PM at the Tipton Public Library, 127 East Madison Street, Tipton, Indiana 46072. The notice also stated that OAQ proposed to issue a Part 70 Operating Permit located at 841 South 550 West, Tipton, Indiana 46072. Finally, the notice informed interested parties that all interested parties are invited to be present or to be represented at this meeting.

The following is a compilation of comments and responses as well as the additional information that IDEM alluded to in the hearing that would be provided. The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

The hearing was convened at 6:02 PM on March 25, 2003 at the Tipton Public Library, 127 East Madison Street located in Tipton, Indiana. Paul Dubenetzky, Chief of the Air Permits Branch at IDEM acted as the hearing officer. Nisha Sizemore, a technical environmental specialist in the Office of Air Quality Permits Branch, was also present. A transcript was made of the hearing.

The following speakers were present: John Reid, Larry Beard, Mark Longfellow, Jane Harper, Rebekah Medley, Richard Johnson, Norman Pyke, and Peter Van Dae.

Comment 1 - John Reid and Larry Beard

Concerns were expressed regarding the compliance history of Wabash Alloys. Mr. Reid felt that instead of complying with their permit, Wabash Alloys was requesting that the permit be amended to make them legal. He also wondered how effective any enforcement actions had been to date. Ms. Medley asked why Wabash Alloys could get a new permit when its emissions where greater than the existing permit allows. Mr. Beard asked about the nature of the violations that led to a fine that was levied in July 2002.

Response 1

Wabash Alloys has applied to obtain the appropriate permit for a source with the potential to emit more than 10 tons of a single Hazardous Air Pollutant (HAP) or more than 25 tons of any combination of HAPs. The specific issues regarding the circumstances and timing of this application are explained in Response 2 regarding hydrochloric acid emissions.

The fine that Wabash Alloys agreed to pay in 2002 was related to two different sets of violations. One of the elements of an air compliance inspection is to review the records of required compliance monitoring activities. Record reviews conducted during June 1999 and May 200 inspections of Wabash Alloys revealed that there were dozens of times that Wabash Alloys either failed check their baghouses or failed to respond to abnormal baghouse operating conditions. Because there are no records of responses or causes of the abnormalities, the OAQ cannot determine whether any emission limits were violated during these times. The second violation was documented during routine surveillance of the plant in May 2001. When the inspector arrived at the plant a dense plume of smoke was observed crossing the property line. The inspector entered the plant and Wabash Alloys personnel explained that there had been a power failure at the plant. When power was restored to the plant, power was not reset at the baghouse exhaust system. This resulted in uncontrolled furnace emissions exhausting to the atmosphere. The situation was rectified within 30 minutes of the inspector's initial observation. The compliance monitoring violations were combined with this more serious emissions violation. The matter was settled with Wabash Alloys agreeing to develop a standard operating procedure that ensures that the process equipment cannot operate unless the air pollution control equipment is also operating, including detailed steps that operating personnel must take to confirm that the controls are operating normally. This procedure is being incorporated into the Part 70 Permit. Wabash Alloys also agreed to pay a $28,200 penalty. These agreements were formalized in an Agreed Order.

In August 2002, Wabash Alloys notified the IDEM that on 16 days abnormal baghouse readings had been recorded without subsequent response steps. Again, without records of why the baghouse was not operating properly, it is not possible to determine whether there were violations of any emissions limits. Nonetheless, Wabash Alloys agreed to pay a $10,312.50 penalty. Because this was the second violation related to failure to respond to abnormal conditions, the penalty was significantly higher than it otherwise would have been.

There have been no instances of production equipment operating without controls since implementing the standard operating procedure required by the Agreed Order. Subsequent inspections have found no new violations of the compliance monitoring requirements. The IDEM believes that the enforcement process has served its purpose of bringing Wabash Alloys into compliance by requiring that they do more to ensure that they comply with the rules and by levying penalties to deter future avoidable violations.

Comment 2 - John Reid

Does the proposed permit allow for an increase in hydrochloric acid (HCL) emissions?

Response 2

Hydrochloric acid (HCl), is emitted from these sources. Until recently HCl emissions have not been regulated. The permit does not allow HCl emissions to increase from current levels.

On March 23, 1999 EPA published a National Emission Standard for Hazardous Air Pollutants (NESHAP) that now applies across the whole country to aluminum plants similar to the Wabash Alloys Tipton Plant. IDEM, OAQ and EPA now have new data and know that these HCl emissions are potentially higher than believed when the 1996 permit was written. Wabash Alloys is now required to have a Part 70 Operating Permit program and come into compliance with NESHAP by March 23, 2004 because they are a major source of Hazardous Air Pollutants (HAPs). Wabash Alloys must reduce their HCl emissions to achieve compliance with the NESHAP.

Comment 3 - John Reid

Is EPA or IDEM the enforcement agency?

Response 3

Both the U.S. EPA and IDEM share responsibility for enforcing the conditions in this permit. Generally the state has the lead role in any enforcement action. The U.S. EPA has not taken any enforcement actions at this plant.

Comment 4 - John Reid

How many infractions, or times, can they be out of compliance without losing their permit, or can they even lose a permit?

Response 4

The goal of an IDEM enforcement action is to bring the source back into compliance and to discourage future violations. Fines are calculated based on IDEM's civil penalty policy. Similar types of violations result in similar penalties. A history of past violations is considered when assessing fines. Under the federal Clean Air Act, states are not allowed to deny a Part 70 permit due to noncompliance.

The amount of the fine depends on the magnitude of the violation, the potential harm to human health and the environment, the economic benefit gained by not complying, and the violator's efforts to achieve compliance. A history of past violations is also considered when assessing fines. Fines are calculated using IDEM's Civil Penalty Policy, which is available by calling the Office of Enforcement at 1-800-451-6027 ext 3-5523 and on the IDEM website at: www.in.gov/idem/oe/nrp/civil.html.

Comment 5 - Larry Beard & Jane Harper

Mr. Beard asked whether a newspaper article regarding the recent violations were due to an emergency power outage and paperwork violations was factual. Ms. Harper felt that the article trivialized the violations.

Response 5

As discussed in Response to public hearing Comment 1, the power failure contributed to one of the violations. The February 20, 2003 Kokomo Tribune article referenced that there was a power outage at Wabash Alloys. If the power goes out and the control device was not operating properly, then there probably was a violation of emission limits, but that type of incident is usually recognized as an unavoidable emergency or malfunction. After the power returned and Wabash Alloys restarted its furnaces, they failed to make sure the baghouse restarted their operation. This was not an unavoidable situation. Therefore, uncontrolled emissions were released to the atmosphere in violation of state emission limitations. To avoid this situation in the future, Wabash Alloys has instituted a set of procedures on how to restart the plant after a power failure pursuant to an Agreed Order. No IDEM officials were quoted or referenced in the February 20, 2003 article.

Comment 6 - Larry Beard, Janet Harper, and Rebekah Medley

They talk about the liquid chlorine that is heavily regulated and that there were sensors on-site, that they can conduct daily inspections of the pipes and valves. There was a leak in

January, was IDEM involved and does IDEM regulate liquid oxygen or chlorine? Are there alarms sounded when there is an emergency?

Response 6

IDEM, OAQ, has authority to regulate hydrochloric acid or chlorine that is emitted to the air. Wabash Alloys injects chlorine into the bath of aluminum to remove impurities. Some of it can be emitted as hydrochloric acid. Chlorine also gets tied up the impurities as metallic salts in the dross or slag that comes off of the top of the furnace and is disposed as solid waste. Wabash Alloys is regulated under Occupational Safety and Health Administration (OSHA) for having chlorine in the workplace. But to date, they have not been regulated by IDEM, OAQ Permits Branch. Their use of chlorine was only regulated to the extent that IDEM, OAQ believed that our previous permit limited them to under ten (10) tons per year of actual chlorine emissions.

Liquid chlorine is also regulated by Section 112r of the Clean Air Act. Wabash Allows has filed an Emergency Response Plan with IDEM, EPA, and local authorities to assist in taking appropriate actions in the event of an emergency. Wabash Alloys has five (5) onsite monitors to detect chlorine leaks and conducts daily inspections of its pipes and valves. The monitors sound an audible alarm when a low level of chlorine is detected. Wabash Alloys personnel would immediately respond to any alarms. The Executive Summary of Wabash Alloys' Emergency Response Plan is attached as Appendix A of this Addendum.

The IDEM does not regulate the use of oxygen at the plant. On January 27, 2003, the fire department responded to an emergency call placed by an unknown person reporting "smoke" coming from storage tanks at the Wabash Alloys Tipton Plant. The first fire responder was on the scene by 8:10 am and determined that the normal venting of the oxygen tank resulted in a larger than normal size plume of condensed water vapor from the atmosphere. This plume is nothing more than formation of "fog" or a "cloud" is the area where the oxygen is vented. The larger than normal plume was due to a combination of subzero temperature and high relative humidity.

Since the fire department responded to Wabash Alloys, Wabash Alloys voluntarily reported what happened to IDEM, OAQ that day.

Comment 7 - Larry Beard

What is emission trading and is Wabash Alloys allowed to use emission trading?

Response 7

There is no emission trading program that applies to Wabash Alloys or any other source in Tipton County. Emission trading programs are tools to address regional or national air quality problems. The two programs that currently apply to sources located in Indiana are the "Acid Deposition Control Program" and the "NOx SIP Call." Electric Utility Power Plants are the primary sources regulated under these programs.

The Acid Deposition Control Program was established by the 1990 amendments to the federal Clean Air Act. The goal of the program is to lessen the impact of "acid rain" on the ecosystems of the northeastern U.S. that are particularly sensitive to acid deposition. The predominate source of acid gases that impact the area are coal-fired power plants in the eastern half of the country. The Clean Air Act mandated that emissions of sulfur dioxide and oxides of nitrogen be dramatically reduced from these sources. Because the distance between the sources of the emissions and the impact on the

environment is large, the effectiveness of the program is not sensitive to the exact location of the reduction in emissions. In other words, it doesn't matter whether all power plant in Indiana reduce their emissions by 50% or whether half the power plants reduce by 75% and the rest reduce by 25%, the results in upper New York are the same. It is more cost effective to reduce emissions by a large amount at a large source and by a lesser amount, or not at all, at a smaller source. The trading program provides an "allocation" to each source based on the overall emissions goal. For a goal of 50% reduction, a large source that had emissions of 10,000 tons would be allocated 5,000 tons and a smaller source with emissions of 1,000 tons would be allocated 500 tons. The larger source could add controls to reduced its emissions to 4,000 tons and trade or sell the remaining 1,000 tons of its allocation to the smaller source. The smaller source would not be required to reduce its emissions.

The NOx SIP Call required a similar program as the science of ozone formation became better known over the past 10 years. Oxides of nitrogen emissions from power plants have a much greater impact on regional ozone formation than previously thought. Controls on local sources were not enough to bring areas into compliance with health-based air quality standards. EPA "called" to eastern states (i.e., required states) to revise their State Implementation Plans to dramatically reduce these emissions in order for those states to come into compliance with the standard. The details of this program, and parts of the Acid Deposition Control Program, are different than laid out above, but the concept is the same. If the desired environmental impact is related much more to the size of the emission reduction than it is to the exact location of the emissions, then emissions trading programs can be cost-effective approaches to achieving environmental goals.

Wabash Alloys has permit condition B.20(c) that references emissions trading programs because such a condition is a required under state and federal law. Since there is no existing emissions trading program that applies to Wabash Alloys, the condition does not provide an alternative means of achieving compliance with any emission limitations that do apply. As was the case with the existing emissions trading programs, any future programs that may apply to Wabash Alloys would be establish by a state rulemaking process that has several opportunities for public comment and two public hearings before the Indiana Air Pollution Control Board.

Comment 8 - Larry Beard and Rebekah Medley

If there were an emission trading program in the future, and they took advantage of it wouldn't they be emitting more pollutants?

Response 8

It's unlikely that an emissions trading program would allow Wabash Alloys to "trade" an increase in emissions in Tipton for a decrease at another plant. The existing rules that apply to Wabash Alloys are designed to ensure that emissions do not adversely affect local air quality. Trading programs are not designed to achieve this purpose. Again, any future trading programs will be established by rule. The rationale for the trading program would be available for public review, comment, and hearing.

Comment 9 - Larry Beard

Can the documents IDEM receives from Wabash be sent to the local health department?

Response 9

The OAQ routinely provides copies of the reports of inspection and surveillance activities at Wabash Alloys to the Tipton County Health Department. The health department has not requested copies of the reports that are submitted by Wabash Alloys.

Any member of the public can request and obtain copies of these reports and other public documents from the OAQ. Unless it is a very voluminous request, there is no charge for documents.

Comment 10 - Larry Beard

How do you plan to address the opacity of air emissions at night?

Response 10

IDEM, OAQ will be relying on monitoring the performance of the baghouse itself. The National Emissions Standard for Hazardous Air Pollutants will require more rigorous monitoring of the baghouse beginning in March 2004.

Wabash Alloys has chosen to install a baghouse leak detection system to comply with the new monitoring requirements. This system provides a direct indication of whether an abnormal amount of particles are coming out of the baghouse. If the system detects an abnormality, an alarm is sounded and the baghouse is checked for leaking bags or other problems.

Comment 11 - Mark Longfellow

When the inspector, Mr. Sekula, does his inspection does he evaluate production and the amount of capacity?

Response 11

Wabash Alloys does not have a direct production limit in their current Federally Enforce State Operating Permit (FESOP) F 159-5547-00008, issued December 9, 1996. In their FESOP, Wabash Alloys was limited to pound per hour and ton per month emission limits.

These emission limits in the FESOP were intended to limit the emissions from the source, even if operated at full capacity, to less than the Part 70 Operating Permit thresholds of one hundred (100) tons per year for PM_{10}, CO, VOC, NO_X and SO_2, as well as ten (10) tons per year of a single HAP or twenty-five (25) tons per year of the combination of all HAPs. In addition, other emission limits were incorporated to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

This permit also does not limit production. Inspections can determine if equipment has operated at greater than its stated annual capacity.

Comment 12 - Mark Longfellow

Does IDEM, OAQ currently monitor on a quarterly basis? With the potential adoption of this new permit, is there anything in the permit that would prevent them from increasing production?

Response 12

This permit and the previous permits allow Wabash Alloys to operate at 100% of its existing production capacity. Any change that would increase production, would most likely require prior approval from IDEM, OAQ, and the public would be notified in a manner similar to the notice provided of this permit. Small changes in capacity that result in small increases in emissions may be exempt or qualified to be approved without a public comment period. The public is notified of any approvals issued by the OAQ.

Comment 13 - Mark Longfellow

If an employee forgets to check the baghouse gauges or whatever, we have no record of what was emitted, so we hope that wasn't a time when there was a large emission.

Response 13

Routinely checking the operation of control devices to ensure that information is available to determine compliance is very important. Response 1 to the comments received at the public hearing lays out how repeated failure to comply with compliance monitoring provisions results in escalating penalties.

Response 10 to the comments received at the public hearing points out how the new National Emissions Standard for Hazardous Air Pollutants requires that a new bag leak detection system be installed by March 2004. This system does not rely as much on employees manually checking the baghouse gauges. The leak detection system is an integrated, continuous check on the baghouses that sounds an alarm system when there's a problem.

Comment 14 - Mark Longfellow

Will the mechanical-type device be more effective than human observation?

Response 14

The OAQ believes that this system is more reliable than visible emissions evaluations and more reliable than observing changes in pressure drops. When the alarm sounds, Wabash Alloys will still rely on the operators at the plant to find out why the alarm sounded and fix whatever caused that the alarm.

Comment 15 - Mark Longfellow

With Wabash Alloys' previous noncompliance and fines, how does Wabash Alloys compare with similar plants? Are additional requirements incorporated in the permitting process?

Response 15

The OAQ has recorded more violations at Wabash Alloys than most other plants since 1999. The nature and extent of those violations is discussed in Response 1 to the comments received at the hearing. The OAQ has found no violations at Wabash Alloys since August 2002. The OAQ will, if necessary, incorporate additional requirements in a permit based on non-compliance. For example, the standard operating procedure that was developed in accordance to an Agreed Order has been carried over into this permit.

Comment 16 - Mark Longfellow

Is IDEM, OAQ requiring the bag leak detection system in reaction to the EPA's new standard?

Response 16

Wabash Alloys chose to install a bag leak detection system by March 2004 to comply with the new NESHAP promulgated by U.S. EPA. This permit contains conditions (D.1.13 & D.2.11) regarding its use.

Comment 17 - Mark Longfellow

Has IDEM issued any permits that are more stringent than the proposed permit for Wabash Alloys? Are there any local requirements that are more stringent?

Response 17

IDEM, OAQ is not aware of any permits or any local government that have more stringent requirements for secondary aluminum plants**.** No counties or cities in Indiana have more stringent emission standards than this new federal National Emissions Standard for Hazardous Air Pollutants. It is very unusual for a city in Indiana to have more stringent emission limitations. They may require more sources to get permits and they may require sources to pay local fees that are different, but they generally don't set more stringent emission limits.

Comment 18 - Mark Longfellow

Is it possible for a local government agency to set a limit that is more stringent?

Response 18

The Indiana Code specifically allows for local governments to get involved in pollution control if they choose. A local government may adopt and enforce more stringent standards. Neither IDEM nor the U.S. EPA would enforce local standards.

Comment 19 - Mark Longfellow

Expressed concerns with IDEM being located in Indianapolis and not being able to respond to emergencies within an appropriate time frame, and would like to see more local control.

Response 19

Wabash Alloys has expressed the willingness to work directly with the public to address any acute problems. In addition to OAQ staff responding to complaints, IDEM's Emergency Response Section responds to environmental emergencies twenty-four hours a day. Emergencies can be reported toll free at 1-(800) 233-7745. More information regarding emergency response can be obtained via the world wide web at: http://www.in.gov/idem/land/er/index.html

Comment 20 - Rebekah Medley

Wabash Alloys has been producing more emissions than their current permit allows, so they have to apply for another new permit that allows the emissions that are coming out now. However, does that make it right, knowing these emissions could be causing detriment to the environment and certainly to those who are living in the surrounding area?

Response 21

Sources that emit air pollution must comply with air pollution control requirements established by state and federal law. The law continues to evolve, developing new regulatory programs to address environmental concerns. Most of the existing requirements that apply to Wabash Alloys were developed in the 1970s. The requirement to obtain a Title V Operating permit was established in the 1990s. Amendments to the federal Clean Air Act, and subsequent revisions to federal and state rules, required states to issue permits to meet a consistent standard of content, public participation, and EPA oversight. More recently, EPA adopted a National Emission Standard for Hazardous Air Pollutants that will for the first time regulate hydrochloric acid, dioxins, and furans and more stringently regulate particulate matter emissions. The rule will reduce the amount of these pollutants by March 2004. As discussed previously this rule also requires improvements in monitoring compliance on a continuous basis. All of these requirements are contained in this Title V Operating Permit.

Comment 22 - Jane Harper

Ms. Harper asked what anyone could say at a public hearing that would make a difference.

Response 22

Public hearings serve at least three purposes. First, the permit process is design for public oversight. Significant decisions by IDEM are not finalized until the public has an opportunity to review the preliminary decision. While air permit review can be technically and legally complex, the public may draw attention to an applicable requirement or a problem at the source that could be better addressed by the permit. Certain legal requirements allow IDEM to exercise discretion in the way that they are implemented in permits. Community concerns can influence the way that IDEM exercises its discretion in such cases. Prior to the compliance date of the NESHAP, compliance monitoring is an example of such a requirement that the rules leave to the discretion of the agency.

Public hearings also provide an opportunity for a face to face discussion between concerned citizens and IDEM on how the particular permit protects the environment.

And lastly, the hearing provides an opportunity for concerned citizens to learn more about the IDEM's authority to regulate air pollution in their community. The IDEM has only the authority granted to it by law. Citizens who believe that IDEM should have additional authority to address environmental issues can choose to participate in efforts to change the law. More information about participating in environmental decisions can be found at: http://www.in.gov/idem/guides/publicparticipation.

Comment 23 - Jane Harper

Ms. Harper expressed concerns that there could be hazardous waste in water discharges and that there was no municipal utilities to treat them.

Response 23

The IDEM Office of Water Quality regulates Wabash Alloys through the Storm Water rule. This rule addresses pollution on the ground that might wash into a stream or a ditch following significant rainfall. The storm water run-off has to be collected and sent to a holding pond and meet specific requirements

of the rule. Wabash Alloys discharges noncontact cooling water to a lined pond where it cools and is recirculated as cooling water at the plant. The plants sanitary sewers are treated in a septic field.

Comment 24 - Nolan Pyke, Tipton County Health Department

Is IDEM, OAQ aware of any type of plants anywhere that are putting monitoring devices to call 911 or a fire department when those alarms go off? If the alarm goes off, what's going to stop Wabash Alloys from hitting the alarm to shut the alarm off and let it continue going on?

Response 24

Wabash Alloys has developed a Risk Management Plan as required by Section 112(r) of the federal Clean Air Act. The Executive Summary to that plan is attached to this addendum as Appendix A. In addition to the procedures that are implemented to prevent releases and the steps taken internally to address releases, the plan also requires that local officials be notified of any release. 911 is used to alert officials of any release with the potential to leave the property. Alarms triggered by the baghouse leak detection system are electronically recorded. Failure to take reasonable response steps when the alarm sounds is a violation of the permit. Falsifying compliance-related records can subject individuals to criminal prosecution.

Comment 25 - Larry Beard

Does this permit last five years?

Response 25

The permit expires five (5) years from its issuance date.

Comment 26 - Larry Beard

Is it possible to delete Condition B.20 (Operational Flexibility) regarding emission trades from the permit and instead establish a limit that caps their emissions to what they are actually emitting now?

Response 26

Condition B.20 is required by state and federal law (326 IAC 2-7-5(8) and 40 CFR 70.6(a)(8)) require that every permit contain this condition. IDEM does not have authority to unilaterally restrict Wabash Alloys to their current actual emissions.

Comment 27 - Larry Beard

How does IDEM know if alarms have gone off and if they are keeping good records on every shift?

Response 27

The bag leak detection system automatically records all alarms. In addition to an alarm, the systems do have an automatic recorder. It’s a criminal offense for a plant employee to erase or falsify the records.

The bag leak detection systems are tailored to the individual applications and emission unit(s). Each system is capable of monitoring multiple baghouses and usually multiple parameters, such as differential pressure, temperature, fan amperage, air flow rates and control device identification. The systems are all computerized and the control devices are networked to the monitoring system.

Comment 28 - Larry Beard

Can mandatory video monitors be put into the permit if Wabash Alloys continues to be in noncompliance?

Response 28

The NESHAP will soon require improved fume capture systems and implementation of the bag leak detection system, that monitors continuously, 24 hours per day 7 days per week.

Therefore, at this time, IDEM, OAQ will not to require video monitors. This is an option that would be considered if there are additional violations that could be better documented by video monitors.

Comment 29 - Larry Beard

On page 24 of 59 of the permit Condition C.18(c)(1) states, "prompt action." Please define "prompt action."

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

Response 29

The condition does not establish a specific time frame, because “prompt” can depend on specific circumstances. For the purposes of this condition, correcting the problem before the next reading was due would be considered prompt.

Comment 30 - Larry Beard

In Condition C.18(c)(4), references a "normal parameter." Can you define what a normal parameter would be?

Response 30

Condition C.18(c)(4) has been abstracted from the proposed permit for reference as follows:

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

Normal parameters are the values of the parameters defined in the individual condition D Sections of the permit. For example, Condition D.1.21 establishes a normal pressure drop range of 2.0 and 8.0 inches of water. The normal ranges are established by reviewing information such as manufacturer's recommendations and observations during compliance stack tests. When the baghouse pressure drop is outside of that normal range, Wabash Alloys is required to take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports (Condition C.18). Condition C.18(c)(4) addresses the situation of the control device being temporarily out of range, and coming back into the normal parametric range before response steps are taken.

Comment 31 - Larry Beard

Conditions B.12(a), (b) and (b)(4) says an emergency is not a defense. The article in the newspaper talks about a power outage, Wabash Alloys is reportedly using that as a defense. Can you explain that a little bit?

Response 31

The entire Condition B.12 has been abstracted from the proposed permit for reference as follows:

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

This condition is a required element of Part 70 permits (326 IAC 2-7-5(1)(F) and 40 CFR 70.6(g)). An affirmative defense means that in most cases an enforcement action will not be taken. The "affirmative defense" for emergencies is established at (326 IAC 2-7-16 and 40 CFR 70.6(g). Consistent with these rules, Condition B.12(a) states that an emergency does not provide an affirmative defense for violations of any health-based stand and (b) provides that defense for violations of technology-based standards. While nearly all permit conditions are intended to protect the environment, few are considered health-based. Health-based standards are established by 40 CFR 61. The rule controlling asbestos emissions from certain types of manufacturing is one example of the rules contained in 40 CFR 61. All other air pollution control rules are considered to be technology-based requirements. A permit would include health-based conditions if 40 CFR 61 was applicable or if an air quality analysis established that emissions needed to be lower than the applicable technology-based limit to prevent a violation of a National Ambient Air Quality Standard.

If the power goes out and the source complies with all of emergency provision requirements, including providing notice to IDEM, then IDEM, OAQ will not pursue enforcement action in most cases. This is because it was an emergency beyond the source's control. If the power outage happens and the source does not do the what this permit condition tells the source to do, then the source can no longer have that affirmative defense.

The February 20, 2003 Kokomo Tribune article referenced the fact that there was a power outage at Wabash Alloys. Wabash Alloys restarted its furnaces when the power returned, but failed to make sure that the baghouses restarted their operation. The affirmative defense was available for any excess emissions resulting during the power failure. It was not available for the subsequent resumption of operations while the baghouses were inoperable.

Comment 32 - Larry Beard

Does IDEM, OAQ contact the utility company to verify the outage?

Response 32

The OAQ can confirm most power outages with the local utility. Some outages can originate within the plant.

Comment 33 - Peter Van Dae/Larry Beard

Other things are in this proposed permit that limit hydrochloric acid, total hydrocarbons, and total tetra-, penta-, hexa-, and octachlorinated dibenzo dioxins and furans (D/F). Is Wabash Alloys required to put instrumentation in to monitor that, or does IDEM, OAQ have something else in the permit that estimates what their emissions are based on their production?

Response 33

Conditions D.1.9, D.1.10, D.2.8 and D.2.9 in the proposed permit require that Wabash Alloys perform stack tests in order to show compliance with the emission limits for these and other pollutants. These tests use U.S. EPA-approved methods measure actual emissions from the stacks over the course of several hours. The U.S. EPA has not approved any methods to continuously measure these pollutants.

The stack tests establish that each emissions unit complies with the emission limits when operating normally. The permit requires the different performance parameters that define normal operation be recorded during the tests. For example, to control hydrochloric acid (HCl) emissions, the source injects lime (a base) into the gas stream. As the lime coats the bag, it interacts with the hydrochloric acid and neutralizes it. The permit requires Wabash Alloys to monitor & record chlorine injection into the furnace and lime injection into the gas stream during operation. Maintaining these parameters at the levels established HCl emissions were directly measured during the most recent stack test provides a reasonable assurance of continuous compliance the emission standard. There is an alarm directly in the building where the chlorine is vaporized as well as an alarm on the furnaces. The baghouse leak detection system is alarmed.

The permit also requires production records for each batch produced by each furnace. The baghouse leak detection system and the temperature measuring system monitors the performance of the baghouse that controls these emissions.

The following compliance monitoring conditions apply to the furnaces and have been abstracted from the Table of Contents:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.1.16 Labeling [40 CFR 63.1510(c)]
D.1.17 Capture/Collection System [40 CFR 63.1510(d)]
D.1.18 Feed/Charge Determination [40 CFR 63.1506(e)]
D.1.19 Corrective Action [40 CFR 63.1506(p)]
D.1.20 Compliance Monitoring Requirements [40 CFR 63.1510(t)] [40 CFR 63.1510(u)]
D.1.21 Parametric Monitoring
D.1.22 Baghouse Inspections
D.1.23 Broken or Failed Bag Detection
D.1.24 Visible Emissions Notations

The following compliance monitoring conditions apply to the shredder and have been abstracted from the Table of Contents:

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]
D.2.13 Capture/Collection System [40 CFR 63.1510(d)]
D.2.14 Corrective Action [40 CFR 63.1506(p)]
D.2.15 Parametric Monitoring
D.2.16 Baghouse Inspections
D.2.17 Broken or Failed Bag Detection
D.2.18 Visible Emissions Notations

Without quoting or paraphrasing the these conditions, Wabash Alloys will be required to:

(a) Inspect all labels on the furnaces required by the NESHAP at least once per month.

(b) Inspect each capture/collection and closed vent system once per year for each furnace.

(c) Install, calibrate and maintain a device to measure the entire weight of feed/charge to the furnaces.

(d) Initiate corrective action if a process parameter and/or baghouse operating parameter

deviates from the range specified in the Operation Maintenance and Monitoring Plan developed by Wabash Alloys.

(e) Calculate and record 3-day and 24-hour rolling averages of PM, HCl and D/F emissions for each furnace on a daily basis.

(f) Record the pressure drop across the baghouses associated with each furnace once per shift.

(g) Inspect the bags of the baghouses controlling the emissions from the furnaces once per calendar quarter.

(h) If a bag failure has been observed, then Wabash Alloys will take response steps specified in the Compliance Response Plan to rectify the failure.

(i) Monitor visible emissions from each furnace once per shift.

Comment 34 - Richard Johnson

Will the state conduct a baseline environmental study over a five-year period of the area? I would like a yes or no answer.

Response 34

No, it is not within the scope of Title V Permitting for IDEM to do this type of environmental study.

Comment 35 -Richard Johnson

Who does have the authority?

Response 35

The county health department could perform such a study, if they wanted. They are not likely to have the resource to do a study. The federal Agency for Toxic Substances and Disease Registry occasionally performs such studies. More information about that agency can be found on the world wide web at: http://www.atsdr.cdc.gov

Comment 36 - Richard Johnson

Can Federal EPA do that?

Response 36

U.S. EPA has programs that require an Environmental Impact Statement for certain project that receive federal funds. EPA then reviews public comments on statement.

Comment 37 - Norman Pyke

Do plants that have more violations get more inspections than plants that have no violations?

Response 37

In general, yes, sources with more violations get inspected more frequently. In addition to complete inspections, the OAQ increases "surveillance" activities at these types of sources. The regular inspector and other inspectors in the area will make a point of observing such a source on their way to do other inspections. If a problem is noticeable, the inspector will enter the plant to further investigate. The OAQ also responds to complaints, which may or may not result in an inspection.

Comment 38 - Mark Longfellow

Since this source is not located in an industrial park but near homes, should some type of special evaluation be made?

Response 38

IDEM, OAQ regulates particulate matter the same in Tipton as the agency would if Wabash Alloys was located in an undeveloped area. Our agency program is set up to safeguard the air quality, across the state.

Comment 39 - Mark Longfellow

Have similar permits been approved under this new program?

Response 39

There are approximately a dozen secondary aluminum sources like Wabash Alloys - Tipton Plant across the state that would be subject to this new NESHAP Subpart RRR rule and its emission

limitations. Ms. Nisha Sizemore has been involved in the permitting of all of them. Mr. Dick Sekula is involved with the inspection of all of them.

Comment 40 – Mark Longfellow

I understand, of course, that Wabash is getting an extension of 18 months.

Response 40

Subpart RRR provides that a source could request a one (1) year extension of the compliance date and that the Commissioner could grant such an extension. Every secondary aluminum source in Indiana that requested an extension was approved a twelve (12) month extension. This source was one of those that received a 12 month extension.

Comment 41 - Mark Longfellow

Has the level of compliance improved at secondary aluminum sources that are now subject to this new NESHAP?

Response 41

Emissions of particulate matter and hydrochloric acid have been reduced at the plants that are currently subject to the NESHAP. Some of these source have not yet demonstrated compliance with the limits on dioxins and furans. Improvements in the practices involving the addition of salt to the furnace or injecting activated carbon into the baghouse or both will be necessary for these sources to come into compliance.

Comment 42 - Richard Johnson

Has the regulated industry tried to delay the implementation of the new federal emissions standards?

Response 42

It is not unusual for U.S. EPA to be sued by industries that would be regulated under a new standard. Sometimes U.S. EPA has been sued by environmentalists for not being tough enough. There was a lawsuit over this rule, but its settlement did not affect the way or time the rule applies to Wabash Alloys Tipton Plant. Wabash Alloys was granted a 12 month extension under the provision in the new NESHAP.

Comment 43 - Richard Johnson

In the last five (5) years, have there been any permits refused in Tipton County?

Response 43

IDEM, OAQ has not denied any air permits in Tipton County during the past five (5) years.

Comment 44 - Larry Beard

Wabash Alloys compliance date was March 23, 2003, is IDEM going to give Wabash Alloys a one year extension?

Response 44

Wabash Alloys has one (1) year from March 2003 to comply with the new rule. The original compliance date was March 23, 2003. IDEM, OAQ approved Wabash Alloy's request for an extension to March 2004. In the meantime, Wabash Alloys has interim milestones that have been incorporated in the proposed permit in Condition C.12 to show that Wabash Alloys is making progress in getting into compliance with the rule by March 2004. Condition C.12 has been re-iterated for information purposes only:

C.12 Compliance Schedule [40 CFR Part 63, Subpart RRR]

On October 16, 2001, IDEM, OAQ approved an extension of the final compliance standards and date contained in 40 CFR Part 63, Subpart RRR for the scrap shredder and the two (2) group 1 reverberatory furnaces. The termination date of this extension is March 23, 2004, which is the final compliance date for 40 CFR Part 63, Subpart RRR.

(a) The Permittee shall complete the following by the specified dates and report within thirty (30) days thereafter or obtain IDEM, OAQ approval to amend the extension letter.

(1) Construction contracts issued by June 30, 2002,

(2) Initiate onsite construction by September 30, 2002, and

(3) Complete construction and initiate debugging by May 31, 2003.

(b) The Permittee shall operate all facilities in compliance with emission limits by March 23, 2004.

Comment 45 - Larry Beard

Should the interim controls listed in item number three (3) by Wabash Alloys already be installed?

Response 45

Wabash Alloys stated in the September 20, 2001 correspondence that the follow interim emission control measures would be accomplished by March 23, 2003:

(a) Installation and use of NESHAP compliant reactive flux flow rate measurement devices.

(b) Installation and use of NESHAP compliant charge weight scale systems.

(c) Installation and use of NESHAP compliant temperature measurement devices at the inlet to the baghouses and combustion chamber of afterburners.

(d) Provide quarterly interim status reports to Agency identify progress to date in line with projected compliance schedule.

Wabash Alloys has met all of the interim deadlines of this condition (now C.13). The condition is remaining in the permit in its entirety until final compliance has been demonstrated.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Wabash Alloys, L.L.C.**
Source Location:	**841 South 550 West, Tipton, Indiana 46072**
Source Phone Number:	**765 - 675 - 6750**
County:	**Tipton**
SIC Code:	**3341**
Operation Permit No.:	**T 159-14125-00008**
Permit Reviewer:	**Mark L. Kramer**

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Wabash Alloys, L.L.C. relating to the operation of a stationary secondary aluminum production source utilizing scrap aluminum. A FESOP 159-5547-00008 was issued on December 9, 1996 to U.S. Reduction Company and was subsequently transferred to Wabash Alloys, L.L.C.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) aluminum reverberatory smelting furnace, known as furnace #1, installed in 1992, equipped with two (2) natural gas-fired oxy-fuel capable burners, each rated at 12.0 million British thermal units per hour, exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Both burners have the ability to burn oxy-fuel which is natural gas with oxygen injected into the system to increase the burning efficiency. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

(b) One (1) aluminum reverberatory smelting furnace, known as furnace #2, installed in 1992, equipped with two (2) natural gas-fired burners, each rated at 12.0 million British thermal units per hour, with the gas-fired burners and the process emissions exhausting to a baghouse system, consisting of the north and south baghouses, and then exhausting through Stacks #2 and #3. Exhausting of the natural gas-fired burners through Stack #5 has been approved by IDEM, OAQ pursuant to SSM 159-14206-00008, issued on January 30, 2002. The installation and operation of two (2) replacement burners rated at 16.0 million British thermal units per hour each, with the ability to burn oxy-fuel, which is natural gas with oxygen injected into the system to increase the burning efficiency have been approved by IDEM, OAQ, pursuant to SSM 159-14206-00008, issued on January 30, 2002, but have not yet been installed. Capacity: 9.95 tons of aluminum scrap per hour. Addition of 0.800 tons of solid reactive flux per hour and 0.175 tons of chlorine per hour.

(c) One (1) scrap aluminum shredder/crusher and associated conveyors, equipped with a cyclone and baghouse, installed in 1996, exhausting through Stack #4, capacity: 23.0 tons of aluminum scrap per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, total rating: 35.84 million British thermal units per hour, including:

(1) Eight (8) space heaters, rated at 0.8 million British thermal units per hour each.

(2) Four (4) molten metal pump preheater boxes, rated at 0.8 million British thermal units per hour each.

(3) Nine (9) hot metal pot stands, each holding one (1) 2.0 million British thermal units per hour pot furnace, installed during various unknown years.

(4) Seven (7) natural gas-fired ladle heaters/pot stands, rated at 2.0 million British thermal units per hour, each.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than a total of six million (6,000,000) British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons, consisting of one (1) gasoline storage tank with a capacity of 500 gallons.

(e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month, consisting of: one (1) diesel oil tank with a storage capacity of 1,000 gallons and one (1) propane storage tank with a capacity of 1,000 gallons.

(f) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, consisting of one (1) closed top non-heated degreaser using non-chlorinated solvents and no halogenated solvents, installed in 1996 (326 IAC 8-3-2) (326 IAC 8-3-5).

(i) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;

(2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) Closed loop heating and cooling systems.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.

(l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(m) Heat exchanger cleaning and repair.

(n) Process vessel degassing and cleaning to prepare for internal repairs.

(o) Paved and unpaved roads and parking lots with public access.

(p) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(r) On-site fire and emergency response training approved by the department.

(s) A laboratory as defined in 326 IAC 2-7-1(21)(D), consisting of a bench-scale assay furnace.

(t) Septic system wastewater treatment - 326 IAC 2-7-1(21)(G)(ix)(CC).

(u) Chlorine usage (vaporize room, pump stations, outside storage area) - no known loss from these areas but insignificant losses from connections and flanges possible.

(v) Dross cooling.

(w) Material loading/unloading - operations performed inside the building (326 IAC 6-3-2).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) FESOP 159-5547-00008, issued on December 9, 1996

(b) MPR 159-10733-00008, issued May 14, 1999; and

(c) SSM 159-14206-00008, issued on January 30, 2002.

All conditions from previous approvals were incorporated into this Part 70 Operating Permit except the following:

(a) FESOP 159-5547-00008, issued on December 9, 1996 and MPR 159-10733-00008, issued on May 14, 1999

Condition D.1.1: The baghouse shall operate at a minimum overall control efficiency of 81% at all times that the melting process is in operation and the particulate matter emissions from the aluminum melting operation shall not exceed 6.20 tons per month and 16.26 pounds per hour. In order to determine continuous compliance with this condition, this equipment shall be limited to twenty (20%) percent opacity. Therefore, the requirements of 326 IAC 2-2 are not applicable. This will also satisfy the requirements of 326 IAC 6-3.

Reason not incorporated: There are two (2) baghouses for the melting process and the PM emission rate has been revised to 0.400 pounds per ton of scrap aluminum melted to maintain the source's minor source status and render the requirements of 326 IAC 2-2 not applicable. The compliance monitoring requirements of Subpart RRR and as well as IDEM, OAQ's compliance monitoring requirements will be required. The opacity requirement of 20% is not necessary any more since 326 IAC 5-1 governs opacity for the source. A separate condition will specify the allowable PM emission rate pursuant to 326 IAC 6-3-2.

(b) FESOP 159-5547-00008, issued on December 9, 1996 and MPR 159-10733-00008, issued on May 14, 1999

Condition D.1.2: The baghouse shall operate at all times that the melting process is in operation and the PM_{10} emissions from the aluminum melting operation shall not exceed 6.20 tons per month and 16.26 pounds per hour. In order to determine continuous compliance with this condition, this equipment shall be limited to twenty (20%) percent opacity. Therefore the requirements of 326 IAC 2-7 are not applicable.

Reason not incorporated: There are two (2) baghouses for the melting process and the PM_{10} emission rate has been revised to 0.600 pounds per ton of scrap aluminum melted to maintain the source's minor source status and render the requirements of 326 IAC 2-2 not applicable. The compliance monitoring requirements of Subpart RRR and as well as IDEM, OAQ's compliance monitoring requirements will be required.

(c) FESOP 159-5547-00008, issued on December 9, 1996 and MPR 159-10733-00008, issued on May 14, 1999

Condition D.1.5: Compliance monitoring requirement to maintain the total static pressure drop between 3 and 6 inches.

Reason not incorporated: The total static pressure drop has been revised from between 3 and 6 inches to between 2 and 8 inches as requested by Wabash Alloys - Tipton Plant.

(d) FESOP 159-5547-00008, issued on December 9, 1996

Condition D.2.1: Pursuant to 326 IAC 2-8, the baghouse shall operate at all times that the shredder/crusher process is in operation and the particulate matter emissions from the shredder/crusher system shall not exceed 4.20 pounds per hour. In order to determine continuous compliance with this condition, this equipment shall be limited to twenty (20%) percent opacity. Therefore, the requirements of 326 IAC 2-2 are not applicable. This will also satisfy the requirements of 326 IAC 6-3.

Reason not incorporated: The shredder/crusher operation is controlled by a cyclone and baghouse and the PM emission rate has been revised to 0.127 pounds per ton to maintain the source's minor source status and render the requirements of 326 IAC 2-2 not applicable. The compliance monitoring requirements of Subpart RRR and as well as IDEM, OAQ's compliance monitoring requirements will be required. A separate condition will specify the allowable PM emission rate pursuant to 326 IAC 6-3-2.

(e) FESOP 159-5547-00008, issued on December 9, 1996

Condition D.2.2: Pursuant to 326 IAC 2-8, the baghouse shall operate at all times that the shredder/crusher process is in operation and the PM_{10} emissions from the shredder/crusher system shall not exceed 4.20 pounds per hour. In order to determine continuous compliance with this condition, this equipment shall be limited to twenty (20%) percent opacity. Therefore, the requirements of 326 IAC 2-7 are not applicable. This will also satisfy the requirements of 326 IAC 6-3.

Reason not incorporated: The shredder/crusher operation is controlled by a cyclone and baghouse and the PM_{10} emission rate has been revised to 0.127 pounds per ton to maintain the source's minor source status and render the requirements of 326 IAC 2-2 not applicable. The compliance monitoring requirements of Subpart RRR and as well as IDEM, OAQ's compliance monitoring requirements will be required. PM_{10} emissions are not subject to the requirements of 326 IAC 6-3-2.

(f) FESOP 159-5547-00008, issued on December 9, 1996

Condition D.2.5: Compliance monitoring requirement to maintain the total static pressure drop between 3 and 6 inches.

Reason not incorporated: The total static pressure drop has been revised from between 3 and 6 inches to between 2 and 8 inches as requested by Wabash Alloys - Tipton Plant.

Enforcement Issue

The source has the following enforcement actions pending:

(a) Notice of Violation (NOV), No. 2000-9527-A, issued February 15, 2001

Designated representatives of the IDEM conducted an inspection of the source on May 23 and July 3, 2000. In the first inspection, the source was alleged to have violated four (4) permit conditions, Conditions C.11, D.1.5, D.2.1 and D.2.5 of their FESOP. Wabash Alloys is alleged to have failed to take corrective action when the pressure drop across the baghouses controlling emissions from the furnaces and shredder/crusher were outside the normal

operating range. Wabash Alloys is alleged to not have operated the baghouse for the shredder crusher at all times. The Agreed Order has not been signed as of June 11, 2002.

(b) Notice of Violation (NOV), No. 2001-10521-A, issued July 19, 2001

Designated representatives of the IDEM conducted a second inspection of the source on May 17, 2001 and alleged that a different permit condition was violated. The condition requiring compliance with 326 IAC 6-4-2 is alleged to have been violated by Wabash Alloys allowing fugitive emissions, (i.e., those not emitted through a vent or stack), to cross property lines at ground level. 326 IAC 6-4-2 is not federally enforceable. The Agreed Order has not been signed as of June 11, 2002.

IDEM representatives have conducted twelve (12) surveillances of the Wabash Alloys - Tipton Plant during the past four (4) years on the following dates:

Jan. 29, 1998	Aug. 25, 1999	Oct. 5, 1999	Oct. 13, 1999	Dec, 9, 1999	Feb. 22, 2000
June 23, 2000	Aug. 29, 2000	Jan. 4, 2001	April 16, 2001	May 17, 2001	June 14, 2001

In addition, formal unannounced annual inspections of the Wabash Alloys - Tipton Plant were conducted on the following dates:

Sept. 12, 1997	Nov. 10, 1998	Jun. 22, 1999	May 23, 2000	Jan. 26, 2001	Jan. 15, 2002

No compliance issues were identified in the January 15, 2002 unannounced inspection.

These Notices of Violation are being addressed in Agreed Orders between IDEM and Wabash Alloys - Tipton Plant.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on March 12, 2001. Additional information was received on March 28, 2001, April 16 and May 22, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations on pages 1 through 7 of 7. The applicant requested that the after control PM emission rate from the furnaces be set equivalent to the requirements of Subpart RRR of 0.4 pounds per ton. Although the applicant requested that the after control PM_{10} emission rate from the furnaces be set equivalent to 0.6 pounds per ton based on 1.2

times the 1998 stack test results, the worst case emission factor of 0.653 pounds of PM_{10} per ton was used. The source has stated that the after control PM and PM_{10} melting emission factors include fluxing in the furnaces. The combustion associated with the reverberatory furnaces is based on the worst case from stack test results at the Dickson Wabash Alloys plant or the AP-42 emission factors. The natural gas combustion is currently vented through the baghouses. The applicant requested that the combustion be calculated separately so that in the future the source can request that the combustion be vented through separate flues without changing emission limits. Therefore, the emission calculations have not credited the baghouse as control for the combustion. The potential emissions from the scrap shredder are based on a stack test results rather than the potential to emit based on the allowable grain loading specified in Subpart RRR. However, the applicant requested that the grain loading value of 0.01 grains per dry standard cubic foot of outlet exhaust specified in Subpart RRR be used to calculate the potential to emit after controls. The potential to emit HCL, HF and DF is based on stack tests plus 50% rather than the limits prescribed by Subpart RRR. Wabash Alloys will have to comply with the Subpart RRR HCL, HF and DF emission rates by the March 23, 2004 compliance date.

Due to the injection of lime into the baghouses controlling the furnaces, HCL and HF are controlled due to the chemical reaction with the lime within the baghouse. Therefore, HCL and HF are not emitted as gases uncontrolled, but rather controlled as particulate matter.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source based on the current operation (excluding the emission limits that were contained in the previous FESOP).

Pollutant	**Potential To Emit** (tons/year)
PM	639
PM_{10}	482
SO_2	15.6
VOC	99.0
CO	99.0
NO_X	99.0

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Hydrogen Chloride (HCL)	503
Hydrogen Fluoride	239
Lead Compounds	1.63
Antimony Compounds	0.0080
Arsenic Compounds	0.0012
Cadmium Compounds	0.0031

HAPs	**Potential To Emit** (tons/year)
Chromium Compounds	0.2592
Manganese Compounds	0.0602
Mercury Compounds	0.0052
Nickel Compounds	0.0448
Selenium Compounds	0.0023
Benzene	0.0009
Dichlorobenzene	0.0005
Formaldehyde	0.041
Hexane	0.793
Toluene	0.0015
TOTAL	744

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} is equal to or greater than one hundred (100) tons per year Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPS is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 emission data transmitted by the applicant in their correspondence received April 16, 2002.

Pollutant	**Actual Emissions** (tons/year)
PM	18.4
PM_{10}	17.7
SO_2	1.07
VOC	16.8
CO	16.6
NO_X	20.2
Lead	0.22

Potential to Emit After Issuance

The source, issued a FESOP 159-5547-00008 on December 9, 1996, has opted to apply for a Part 70 Operating Permit rather than remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable after issuance of the Part 70 Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has constructed new emission units and has been approved to construct others by SSM 159-14206-00008, issued on January 30, 2002, the source's limited potential to emit is based on the emission units included in the original FESOP 159-5547-00008, issued on December 9, 1996, plus the modification SSM 159-14206-00008, issued on January 30, 2002.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Reverberatory Furnaces #1 & 2 Process Only	34.9	56.9	11.8	65.4	42.7	33.1	69.1
Pouring/Casting	0.00	0.00	1.74	12.2	0.00	0.872	0.00
Scrap Shredder	14.9	14.9	0.00	0.00	0.00	0.00	0.00
Reverberatory Furnaces #1 & #2 Natural Gas Combustion	20.9	11.2	0.523	1.47	22.4	26.7	0.504
Insignificant Activities							
Other Natural Gas Combustion	0.330	1.32	0.104	0.954	14.6	17.4	0.327
Loading & Unloading	1.48	0.698	0.00	0.00	0.00	0.00	0.00
Paved Roads	2.20	2.20	0.00	0.00	0.00	0.00	0.00
Degreaser	0.00	0.00	0.00	0.297	0.00	0.00	0.00
Assay Furnace	0.000	0.000	0.00	0.00	0.00	0.00	0.00
Other Insignificant Activities	24.3	11.8	1.5	18.7	19.3	20.9	1
Total Emissions	99.0	99.0	15.6	99.0	99.0	99.0	71.1

(a) Wabash Alloys has requested that the source remain a minor PSD source. Furthermore the total emissions of all criteria pollutants, except SO_2, have been set to 99.0 tons per year to allow for the uncertainty in quantifying the insignificant activities.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or

greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Tipton County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Tipton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Tipton County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The Part 70 application was received on March 12, 2001; after the April 20, 1998 applicability date of the Compliance Assurance Monitoring rule. However, this Part 70 does not involve a pollutant-specific emission unit with the potential to emit after control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

(b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source. The screening and conveying operations in the dross building are not subject to the requirements of NSPS Subpart OOO because secondary aluminum is not

a nonmetallic mineral as defined by this Subpart.

(c) The National Ambient Air Quality Standards have a built in margin of safety to address the welfare and the effects of air pollutants on buildings and structures. Tipton County has been designated as an attainment county for all regulated pollutants regulated by the National Ambient Air Quality Standards, i.e., all regulated pollutants already meet all of the National Ambient Air Quality Standards in Wabash County. The U.S. EPA has recently promulgated a new National Emissions Standard for Hazardous Air Pollutants that will reduce the emission of corrosive compounds from Wabash Alloys. Wabash Alloys has obtained a one- (1-) year extension from IDEM for compliance under federal law to March 24, 2004.

(d) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, 326 IAC 14, (40 CFR Part 63.1500, Subpart RRR).

On October 16, 2001, IDEM, OAQ approved an extension of the compliance standards and date of March 24, 2003 contained in 40 CFR Part 63, Subpart RRR for the scrap shredder and the two (2) group 1 reverberatory furnaces. The termination date of this extension is March 23, 2004, which is the final compliance date.

IDEM, OAQ expects that the following milestones will be completed by the specified dates and reported within thirty (30) days thereafter.

(1) Construction contracts issued - June 30, 2002.

(2) Initiate onsite construction - September 30, 2002.

(3) Complete construction and initiate debugging - May 31, 2003.

(4) Operate all facilities in compliance with emission limits - March 23, 2004.

The extension also applies to:

(5) Submission of the site specific test plan and notice for conducting the initial performance test.

(6) Conducting the initial performance test.

(7) Submission of the initial notification of the compliance status report.

(8) Submission of the operation, maintenance, and monitoring (OM&M) plans and the start-up, shutdown and malfunction plan.

Reverberatory furnaces #1 and #2 (Group 1 furnaces) and the scrap shredder are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63, Subpart RRR). A summary of the requirements is as follows:

(1) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 63 Subpart RRR.

(2) Identification, emission limits and means of compliance shall be posted on all affected sources and emission units.

(3) The shredder shall be controlled by baghouse system.

(4) The reverberatory furnaces shall be controlled by baghouses with continuous lime injection system.

(5) A bag leak detector system shall be installed in accordance with “Fabric Filter Bag Leak Detection Guidance” and operated for north and south baghouses as well as the baghouse associated with the shredder.

(6) A reactive flux injection rate monitoring system shall be installed and operated.

(7) A baghouse inlet temperature monitoring system shall be installed and operated for north and south baghouses as well as the baghouse associated with the shredder.

(8) The PM emissions from the shredder shall not exceed 0.01 grains per dry standard cubic foot of outlet air.

(9) The PM emissions from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.40 pounds per ton of feed.

(10) The HCl emissions from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.40 pounds per ton of feed.

(11) The total polychlorinated dibenzofurans (D/F) emissions from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed fifteen (15) micrograms per megagram of feed.

(12) A scale or scales with an accuracy of plus or minus one (1%) percent shall be installed and utilized to record the weight of each charge and of the reactive flux injection rate.

(13) An operations, malfunction, and maintenance plan shall be developed for the emission capture and collection system, charge monitoring system, PM control systems, reactive flux injection system, and baghouse inlet temperature monitoring system.

(e) The following facilities at this source are not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR Part 63.1500, Subpart RRR).

(1) The pot stands are not classified as either melting/holding furnaces or Group 1 furnaces and therefore, are not subject to the requirements of Subpart RRR.

(2) The bench-scale assay furnace deemed an insignificant activity is not subject to the requirements of Subpart RRR pursuant to 40 CFR 63.1500(e) because this furnace is only used for investigation and research of purchased scrap and does not produce a saleable product.

(f) Note the fluxing of aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, is not conducted by an in-line fluxer.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Wabash Alloys, L.L.C. has requested that the Wabash Alloys - Tipton Plant remain a minor PSD source. Because this source is 1 of the 28 major PSD source categories, PM and PM_{10} as well as the remainder of the criteria pollutants including fugitives shall be limited to less than one hundred (100) tons per year. The PSD minor limits have been set at ninety-nine (99) tons per year for all criteria pollutants except SO_2 due to the difficulty of quantifying emissions from some of the insignificant activities.

326 IAC 2-6 (Emission Reporting)

This source is located in Tipton County and the potential to emit PM_{10} is less than one hundred (100) tons per year. The source is one of the twenty-eight (28) listed sources and its potential to emit PM_{10} is less than one hundred (100) tons per year, including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six- (6-) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one- (1-) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Fugitive dust is not allowed to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on May 7, 1992. The plan consists of:

(a) All access roads to facilities, storage and equipment shall be paved;

(b) Raw materials, products and waste storage shall be under roof or enclosed and not conducive for fugitive dust generation;

(c) Sweeping all paved roads at least once per month, weather permitted;

(d) Aluminum slag/dross shall be cooled under the confines of the emission hoods (until visible emissions ceased); and

(e) Dross and slag shall be stored under roof.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

In order to remain a minor PSD source pursuant to 326 IAC 2-2 and 40CFR Part 52.21, Wabash Alloys shall comply with the following:

(a) The PM emission rate from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.400 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace,

(b) The PM_{10} emission rates from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.653 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace,

(c) The PM and PM_{10} emission rates from the scrap aluminum shredder/crusher and associated conveyors, shall not exceed 0.148 pounds per ton of scrap aluminum shredded,

(d) The VOC emission rates from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.750 pounds per ton of feed melted and 0.140 pounds per ton of feed poured and cast and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace,

(e) The VOC emission rate from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 5.5 pounds per million cubic feet of fuel combusted,

(f) The CO emission rate from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.490 pounds per ton of feed and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace,

(g) The CO emission rate from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 84.0 pounds per million cubic feet of fuel combusted,

(h) The NO_X emission rates from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 0.380 pounds per ton of feed and 0.010 pounds per ton of feed poured and cast and a maximum capacity of 9.95 tons of aluminum scrap per hour per furnace,

(i) The NO_X emission rate from the two (2) burners associated with each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall not exceed 100.0 pounds per million cubic feet of fuel combusted.

326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)

Pursuant to 326 IAC 6-3-2, the allowable PM emissions from the facilities at the source are governed by the following equations:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The allowable particulate matter emissions are summarized in the following table

Process	**Process Weight** (tons per hour)	**Allowable PM Emission Rate** (pounds per hour)	**Potential to Emit After Controls** (pounds per hour)
Reverberatory Furnace #1	9.95	19.1	3.98
Reverberatory Furnace #2	9.95	19.1	3.98
Scrap Shredder	23.0	33.5	3.40

The control equipment shall be in operation at all times each facility is in operation, in order to comply with these limits. All three (3) facilities are in compliance with this rule as shown in the above table.

State Rule Applicability - Insignificant Activities

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover shall be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility shall be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, shall be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)

Pursuant to 326 IAC 6-3-2 and 40 CFR 52 Subpart P, the PM from the material loading/unloading - operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Citizen Concerns - Entire Source

Although IDEM, OAQ as well as the Solid Waste Branch of IDEM do not have the legal authority to required that trucks be tarped to prevent scrap metal from falling from trucks, INDOT does have the authorization to enforce the safety of all vehicles on roads.

Wabash Alloys has informed IDEM that all trucks incoming to the plant with aluminum scrap are intended to be tarped. It is in Wabash Alloy's best interests financially to minimize material loss during transportation. Wabash Alloys has indicated that they will increase their efforts to prevent debris from coming off incoming trucks and will respond to neighbors' request to retrieve this material.

Wabash Alloys has indicated that any environmental-related concerns can be telephoned directly to the foundry at any time so that Wabash Alloys - Tipton Plant can identify the problem and respond promptly. Their telephone number is (765) 675-6750. Wabash Alloys has indicated that they want to be made aware of any problems at the time their neighbors perceive they are causing a problem so that Wabash Alloys can react on a more timely basis.

Testing Requirements

(a) Previous Stack Tests

Prior to the issuance of the FESOP to Wabash Alloys, L.L.C., the former company, U.S. Reduction Company, conducted stack tests on the two (2) reverberatory furnaces, known as furnaces #1 and #2, as well as the scrap shredder to show compliance with the allowable PM emission rates pursuant to 326 IAC 6-3-2. The stack test for reverberatory furnace #1 was conducted on June 10, 1993 and showed compliance with this rule. The stack test for reverberatory furnace #2 was conducted on March 29, 1994 and showed compliance with this rule. The scrap shredder was tested on May 10, 1995 and showed compliance with 326 IAC 6-3-2.

On December 1, 1998, Wabash Alloys, L.L.C. conducted testing of the PM and PM_{10} emission rates from the north and south baghouses associated with reverberatory furnaces #1 and #2. The tests showed that both baghouses were in compliance with the allowable PM emission rates of 16.26 pounds per hour for each baghouse pursuant to 326 IAC 6-3-2 as stated in the FESOP 159-5547-00008, issued on December 9, 1996. The PM emission rates for the north and south baghouses were 2.89 and 3.73 pounds per hour, respectively, equivalent to 0.362 pounds per ton (2.89 pounds of PM per hour/7.975 tons of feed per hour) and 0.342 pounds per ton (3.73 pounds of PM per hour/10.9 tons of feed per hour), respectively. These compare favorably with the 0.4 pounds per ton of feed for the reverberatory furnaces.

The limited PM_{10} emission rate was also 16.26 pounds per hour and both baghouses also complied with this limit. Note that PM_{10} includes filterable and condensible PM_{10}. The results of the PM_{10} baghouse exhaust tests showed the filterable and condensible PM_{10} from the north baghouse was 4.05 and 1.16 pounds per hour, respectively for a total PM_{10} of 5.21 pounds per hour. The results of the PM_{10} baghouse exhaust tests showed the filterable and condensible PM_{10} from the south baghouse was 2.12 and 1.60 pounds per hour, respectively for a total PM_{10} of 3.72 pounds per hour.

For the north baghouse, the 5.21 pounds of PM_{10} per hour is equivalent to 0.653 pounds of PM_{10} per ton (5.10 pounds of PM_{10} per hour/7.975 tons of feed per hour) and for the south baghouse, the 3.72 pounds of PM_{10} per hour is equivalent to 0.341 pounds of PM_{10} per ton (3.72 pounds of PM_{10} per hour/10.9 tons of feed per hour). The north baghouse PM_{10} emission of 0.653 pounds per ton from the 1998 stack test is greater than the proposed PM_{10} emission rate of 0.6 pounds per ton to render the requirements of 326 IAC 2-2 not applicable. However, the north and south baghouses had 5.21 and 3.72 pounds per hour for a total of 8.93 pounds per hour and also had 7.975 + 10.9 tons of feed per hour for a total of 18.875 tons of feed per hour. These values are equivalent to 8.93 pounds of PM_{10} per hour / 18.875 tons of feed per hour = 0.473 pounds of PM_{10} per ton which is less than 0.6 pounds of PM_{10} per ton of feed.

In addition, the scrap shredder was tested for its PM and PM_{10} emission rates on December 3, 1998 to show compliance with 326 IAC 6-3-2 and 326 IAC 2-8-4. The allowable PM and limited PM_{10} emission rates were both 4.20 pounds per hour. The measured PM emission rate of 0.47 pounds per hour showed compliance with the 326 IAC 6-3-2 rate of 4.20 pounds per hour. The results of the PM_{10} cyclone/baghouse exhaust test showed the filterable and condensible PM_{10} from the cyclone/baghouse was 0.94 and 0.48 pounds per hour, respectively for a total PM_{10} of 1.42 pounds per hour which is in compliance with the 4.20 pound per hour PM_{10} emission rate.

The 0.47 pounds of PM per hour is equivalent to 0.021 pounds of PM per ton (0.47 pounds of PM per hour/22.85 tons of scrap per hour). The 1.42 pounds of PM_{10} per hour is equivalent to 0.062 pounds of PM per ton (1.42 pounds of PM_{10} per hour/22.85 tons of scrap per hour). These equivalent PM and PM_{10} pounds per ton values compare favorably with the proposed 0.148 pounds of PM/PM_{10} to render the requirements of 326 IAC 2-2 not applicable. This also complies with the 0.01 PM grain loading limit required by Subpart RRR.

(b) Proposed Stack Tests

(1) To demonstrate compliance with 326 IAC 6-3-2, a compliance stack test of PM for the reverberatory furnaces #1 and #2 shall be performed within 180 days of permit issuance since two and a half (2.5) years from the last stack test have past.

(2) To demonstrate compliance with 326 IAC 6-3-2, a compliance stack test of PM for the scrap shredder shall be performed within 180 days of permit issuance.

(3) To demonstrate compliance with the emission limits necessary to render the requirements of 326 IAC 2-2 not applicable, a compliance stack test of PM and PM_{10} for the reverberatory furnaces #1 and #2 and their baghouses shall be performed within 180 days of permit issuance since two and a half (2.5) years from the last stack test have past.

(4) To demonstrate compliance with the emission limits necessary to render the

requirements of 326 IAC 2-2 not applicable, a compliance stack test of PM and PM_{10} for the scrap shredder and its baghouse and cyclone shall be performed within 180 days of permit issuance.

(5) Proposed Subpart RRR Stack Tests

On October 16, 2001, IDEM, OAQ approved an extension of the final compliance standards including the date contained in 40 CFR Part 63, Subpart RRR for the scrap shredder and the two (2) group 1 reverberatory furnaces. The termination date of this extension is March 23, 2004, which is the final compliance date. Therefore, stack testing is proposed as follows to show compliance with the requirements of 40 CFR Part 63, Subpart RRR prior to September 23, 2004 which is within 180 days of the compliance date of March 23, 2004.

(A) PM stack tests for the scrap shredder, to show compliance with 40 CFR Part 63, Subpart RRR.

(B) PM, D/F and HCL testing on baghouses, known as north and south (reverberatory furnaces #1 and #2) to show compliance with 40 CFR Part 63, Subpart RRR.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, have applicable compliance monitoring conditions as specified below:

(1) The aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, shall be controlled by baghouses with continuous lime injection system.

(2) The Permittee shall install, operate, and maintain a capture/collection system for the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, equipped with a baghouse; and inspect each capture/collection and closed vent system at least

once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.

(3) The Permittee of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, using a fabric filter or lime-injected fabric filter to comply with the requirements of this subpart shall install, calibrate, maintain, and continuously operate a bag leak detection system.

These requirements apply to the Permittee of the existing aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, using a bag leak detection system.

(A) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(B) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997). This document is available from the U.S. Environmental Protection Agency; Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center (MD-19), Research Triangle Park, NC 27711. This document also is available on the Technology Transfer Network (TTN) under Emission Measurement Technical Information (EMTIC), Continuous Emission Monitoring. Other bag leak detection systems shall be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations.

(C) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(D) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

(E) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.

(F) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

(G) For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.

(H) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(I) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(J) Operate each fabric filter system such that the bag leak detection system alarm does not sound more than five (5%) percent of the operating time during a six (6) month reporting period. In calculating this operating time fraction, if inspection of the fabric filter demonstrates that no corrective action is required, no alarm time is counted. If corrective action is required, each alarm shall be counted as a minimum of one (1) hour. If the Permittee takes longer than one (1) hour to initiate corrective action, the alarm time shall be counted as the actual amount of time taken by the Permittee to initiate corrective action.

(K) Maintain the three (3) hour average inlet temperature for each fabric filter at or below the average temperature established during the performance test plus twenty-five (25) degrees Fahrenheit.

(L) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

(4) The Permittee shall install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each reverbatory furnace.

(A) The monitoring system shall record the weight for each fifteen- (15-) minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.

(B) The accuracy of the weight measurement device shall be $\pm$1 percent of the weight of the reactive component of the flux being measured.

(C) The Permittee shall verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

(D) Calculate and record the gaseous or liquid reactive flux injection rate (kilograms per megagram or pounds per ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512 (o).

(E) Record, for each fifteen- (15-) minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:

(i) Gaseous or liquid reactive flux other than chlorine; and

(ii) Solid reactive flux.

(F) Calculate and record the total reactive flux injection rate for each operating

cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).

(5) The Permittee shall install, calibrate, maintain, and operate a device to continuously monitor and record the temperature of the fabric filter inlet gases consistent with the requirements for continuous monitoring systems in Subpart A of this part. The temperature monitoring device shall meet each of these performance and equipment specifications:

(A) The monitoring system shall record the temperature in fifteen- (15-)minute block averages and calculate and record the average temperature for each three- (3-) hour block period.

(B) The recorder response range shall include zero (0) and one and half (1.5) times the average temperature established according to the requirements in 40 CFR 63.1512(n).

(C) The reference method shall be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system, subject to approval by the Administrator.

(6) The Permittee of a continuous lime injection system shall verify that lime is always free-flowing by either:

(A) Inspecting each feed hopper or silo at least once each eight- (8-) hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the eight- (8-) hour periods, the owner or operator shall increase the frequency of inspections to at least once every four- (4-) hour period for the next three (3) days. The Permittee may return to inspections at least once every eight (8) hour period if corrective action results in no further blockages of lime during the three- (3-) day period; or

(B) Subject to the approval of the IDEM, OAQ, installing, operating and maintaining a load cell, carrier gas/lime flow indicator, carrier gas pressure drop measurement system or other system to confirm that lime is free-flowing. If lime is found not to be free-flowing, the Permittee shall promptly initiate and complete corrective action, or

(C) Subject to the approval of the IDEM, OAQ, installing, operating and maintaining a device to monitor the concentration of HCl at the outlet of the fabric filter. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the Permittee shall promptly initiate and complete corrective action.

(7) The Permittee of a continuous lime injection system shall record the lime feeder setting once each day of operation.

(8) A Permittee who intermittently adds lime to a lime coated fabric filter shall obtain approval from the permitting authority for a lime addition monitoring procedure. The IDEM, OAQ will not approve a monitoring procedure unless data and information are submitted establishing that the procedure is adequate to ensure that relevant

emission standards will be met on a continuous basis.

(9) The Permittee of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, subject to an emission limit in kilogram per megagram (pounds per ton) or micrograms per megagram (grams per ton) of feed/charge shall install, calibrate, operate, and maintain a device to measure and record the total weight of feed/ charge to, or the aluminum production from the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs shall be measured and recorded on an emission unit-by-emission unit basis. The accuracy of the weight measurement device or procedure shall be $\pm$1 percent of the weight being measured.

(10) Pursuant to 40 CFR Part 63.1510 the Permittee shall inspect the labels for each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, at least once per calendar month to confirm that posted labels as required by the operational standard in 40CFR 63.1506(b) are intact and legible.

(11) The Permittee shall calculate and record the three- (3-) day, twenty-four (24-) hour rolling average emissions of PM, HCl, and D/F for each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, on a daily basis. To calculate the three- (3-) day, twenty-four (24-) hour rolling average, the Permittee shall:

(A) Calculate and record the total weight of material charged to each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, for each twenty-four (24-) hour day of operation using the feed/charge weight data collected as required under Subpart RRR. If the Permittee chooses to comply on the basis of weight of aluminum produced by each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, rather than weight of material charged to each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, all performance test emissions results and all calculations shall be conducted on the aluminum production weight basis.

(B) Multiply the total feed/charge weight to each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, or the weight to each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, or the weight of aluminum produced by each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, for the twenty-four (24-) hour period by the emission rate (in lb/ton of feed/charge) for that aluminum reverberatory smelting furnaces, known as furnaces #1 or #2, (as determined during the emission test) to provide emissions for each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, for the twenty-four (24-) hour period, in pounds.

(C) Divide the total emissions for each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, for the twenty-four (24-) hour period by the total material charged to the each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, or the total weight of aluminum produced by each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, over the twenty-four (24-) hour period

to provide the daily emission rate for each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2.

(D) Compute the twenty-four (24-) hour daily emission rate using the equation:

$$E_{day} = \frac{\sum_{i=1}^{n} \left(T_{ix} ER_i\right)}{\sum_{i=1}^{n} T_i}$$

Where,

Eday = The daily respective PM, HCl, or D/F emission rate for the secondary aluminum processing unit for the twenty-four (24-) hour period;

Ti = The total amount of feed, or aluminum produced, for emission unit i for the twenty-four (24-) hour period in tons;

ERi = The measured emission rate for emission unit i as determined in the performance test (lb/ton or µg/m^3 /Mg or feed/charge); and

n = The number of emission units in the secondary aluminum processing unit.

(E) Calculate and record the three- (3-) day, twenty-four (24-) hour rolling average for each pollutant each day by summing the daily emission rates for each pollutant over the three (3) most recent consecutive days and dividing by three (3).

(12) The Permittee shall prepare and implement for each of the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the applicable permitting authority for review and approval as part of the application for a Part 70 or Part 71 permit. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by the IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

(A) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.

(B) A monitoring schedule for each affected source and emission unit.

(C) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.

(D) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(i) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(ii) Procedures for the quality control and quality assurance of continuous emission systems as required by the general provisions in Subpart A of this part.

(E) Procedures for monitoring process and control device parameters, including procedures for annual inspections of afterburners, and if applicable, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.

(F) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (b)(1) of this section, including:

(i) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and

(ii) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(G) A maintenance schedule for each process and baghouse that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(13) Visible emissions notations of the reverberatory furnaces #1 and #2 stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(14) The Permittee shall record the total static pressure drop across the north and south baghouses used in conjunction with the aluminum reverberatory smelting furnaces, known as furnaces #1 and #2, at least once per shift when either furnace is in operation. When for any one reading, the pressure drop across the north or south baghouses is outside the normal range of 2.0 and 8.0 inches of water or a range

established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(15) An inspection shall be performed within the last month of each calender quarter of all bags controlling the reverberatory furnaces operations. All defective bags shall be replaced.

(16) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(17) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the baghouses for the reverberatory furnaces must operate properly to ensure compliance with 326 IAC 6-3-2, 326 IAC 2-2, NESHAP Subpart RRR and 326 IAC 2-7 (Part 70).

(b) The scrap shredder equipped with a cyclone and baghouse has applicable compliance monitoring conditions as specified below:

(1) The Permittee shall install, operate, and maintain a capture/collection system for the scrap shredder equipped with a baghouse; and inspect each capture/collection and closed vent system at least once each calendar year to ensure that the system is operating in accordance with the operating requirements in 40CFR 63.1506(c) and record the results of each inspection.

(2) The Permittee of the scrap shredder using a fabric filter to comply with the requirements of Subpart RRR shall install, calibrate, maintain, and continuously operate a bag leak detection system.

These requirements apply to the Permittee of the scrap shredder using a bag leak detection system.

(A) The Permittee shall install and operate a bag leak detection system for each exhaust stack of a fabric filter.

(B) Each triboelectric bag leak detection system shall be installed, calibrated, operated, and maintained according to the "Fabric Filter Bag Leak Detection Guidance," (September 1997). This document is available from the U.S. Environmental Protection Agency; Office of Air Quality Planning and Standards; Emissions, Monitoring and Analysis Division; Emission Measurement Center (MD-19), Research Triangle Park, NC 27711. This document also is available on the Technology Transfer Network (TTN) under Emission Measurement Technical Information (EMTIC), Continuous Emission Monitoring. Other bag leak detection systems shall be installed, operated, calibrated, and maintained in a manner consistent with the manufacturer's written specifications and recommendations.

(C) The bag leak detection system shall be certified by the manufacturer to be capable of detecting PM emissions at concentrations of ten (10) milligrams per actual cubic meter (0.0044 grains per actual cubic foot) or less.

(D) The bag leak detection system sensor shall provide output of relative or absolute PM loadings.

(E) The bag leak detection system shall be equipped with a device to continuously record the output signal from the sensor.

(F) The bag leak detection system shall be equipped with an alarm system that will sound automatically when an increase in relative PM emissions over a preset level is detected. The alarm shall be located where it is easily heard by plant operating personnel.

(G) For negative pressure or induced air fabric filters, the bag leak detector shall be installed downstream of the fabric filter.

(H) Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

(I) The baseline output shall be established by adjusting the range and the averaging period of the device and establishing the alarm set points and the alarm delay time.

(J) Following initial adjustment of the system, the Permittee shall not adjust the sensitivity or range, averaging period, alarm set points, or alarm delay time except as detailed in the OM&M plan. In no case may the sensitivity be increased by more than one hundred (100%) percent or decreased more than fifty (50%) percent over a 365-day period unless such adjustment follows a complete fabric filter inspection which demonstrates that the fabric filter is in good operating condition.

(3) The Permittee shall prepare and implement for the scrap shredder, a written operation, maintenance, and monitoring (OM&M) plan. The Permittee shall submit the plan to the IDEM, OAQ for review and approval as part of the application for a Part 70 or Part 71 permit. Any subsequent changes to the plan shall be submitted to the IDEM, OAQ for review and approval. Pending approval by IDEM, OAQ of an initial or amended plan, the Permittee shall comply with the provisions of the submitted plan. Each plan shall contain the following information:

(A) Process and baghouse parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for the scrap shredder and baghouse.

(B) A monitoring schedule for the scrap shredder.

(C) Procedures for the proper operation and maintenance of the scrap shredder and baghouse used to meet the applicable emission limits or standards in 40CFR 63.1505.

(D) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:

(i) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

(ii) Procedures for the quality control and quality assurance of continuous emission systems as required by the general provisions in Subpart A of this part.

(E) Procedures for monitoring process and baghouse parameters, the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.

(F) Corrective actions to be taken when process or operating parameters or baghouse parameters deviate from the value or range established in paragraph (b)(1) of this section, including:

(i) Procedures to determine and record the cause of an deviation or excursion, and the time the deviation or excursion began and ended; and

(ii) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.

(G) A maintenance schedule for the scrap shredder and baghouse that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.

(5) Visible emissions notations of the scrap shredder stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere.

A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(6) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the shredding process at least once per shift when the shredding process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(7) An inspection shall be performed each calender quarter of all bags controlling the shredding operation. All defective bags shall be replaced.

(8) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.

(B) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(9) An inspection shall be performed each calender quarter of all cyclones controlling the shredding operation.

(10) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed

units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(11) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the baghouse and cyclone for the shredding process shall operate properly to ensure compliance with 326 IAC 6-3-2, NESHAP Subpart RRR and 326 IAC 2-7 (Part 70) as well as to render the requirements of 326 IAC 2-2 not applicable.

Conclusion

The operation of this stationary secondary aluminum production source utilizing scrap aluminum shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 159-14125-00008.**

Appendix A

RMP Executive Summary

Accidental release prevention and emergency response policies at Wabash Alloys

The policy of Wabash Alloys, is to develop those programs necessary to protect the health of its employees against on-the-job hazards which may cause sickness or injury now or in the future. Also, as the operator of a facility at which substances may be used that in uncontrolled situations could cause harm to the public and damage to the environment, we will strive for environmental excellence with a commitment to continual improvement, pollution prevention and compliance with legislative requirements. The Risk Management Program (RMP) is one of these programs.

Each employee in areas where the RMP is applicable will be knowledgeable of the related policies and procedures and the supervisors or a designated person is required to insure that they understand them. Employees and supervisors are required to comply with our policies and are subject to corrective action in those cases determined to indicate willful violation.

A written plan of action regarding the implementation of employee participation in the program has been developed as a part of our Release Prevention Program as specified by 29 CFR 1910.119. A compilation of safety information to enable Wabash Alloys and the employees involved in the chlorine operations to operate safety has been accumulated. This process safety information includes information pertaining to the toxicological and physical hazards of the chemical listed. This plan of action includes information pertaining to the technology of the processes, and information pertaining to any equipment used in the processes.

A complete hazard analysis and study of the chlorine systems' mechanical integrity has been completed on the chlorine receipt, storage, and utilization operations have been completed. This analysis was completed by safety and health staff, engineering and maintenance personnel, and certain operational personnel. This analyses involved a review of each operation of the processes to address steps for each operating phase, operating limits, safety and health considerations, and safety systems and their functions. The assessment also included information concerning the emergency action plans related to the process; development and implementation of safe work practices regarding the control of entrance and exit of personnel in the process areas; pre-startup safety; mechanical integrity of equipment; inspection and testing, correction of deficiencies in equipment, planned or unexpected changes to the process, equipment, and procedures to the processes.

A system was developed and is maintained to promptly address the team's findings and recommendations. The hazard analyses will be updated as needed and at least every five (5) years.

Wabash Alloys has developed and implemented written operating procedures to provide clear instructions for safely conducting activities involved in the processes at each operation by our employees, consistent with the process safety information and to address steps for each handling phase, limitations, safety and health considerations, and safety systems and their functions. Other written documentation of standard operating procedures as a part of this program is included in the following documents:

Job Safety Analyses

Mechanical Integrity Study of Process Equipment

Preventive Maintenance Program

Written Emergency Response Plan

Employee Emergency Action and Evacuation Plan

Each employee involved in operations within the processes where the chlorine is received, processed, or used at the facility has been trained in an overview of the processes and in the operating procedures as outlined by OSHA regulations. Refresher training is required every three years, and more often if necessary. Training includes:

(a) Emphasis on the specific safety and health hazards;

(b) Emergency operations in the case of a release including shutdown; and

(c) Safe work practices applicable to the employee's job tasks.

Designated personnel have specific responsibilities related to the use of contractors who perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to areas where the Chlorine is received, stored, or processed in the facility. These responsibilities include specific requirements in selection of contractors regarding the contractor's safety performance and programs; the provision of information concerning the emergency action plans related to the process; development and implementation of safe work practices regarding the control of entrance and exit of contract employers and contract employees in the process areas, periodic evaluation of the contractor related to safety management at the process; maintenance of certain records related to contractor employee injury and illness; development of written procedures for any new processes, and provision of training to employees.

Contractors performing work on or adjacent to equipment or processes in which Chlorine is present must have clearance from the Maintenance Supervisor prior to beginning operations. Each contractor will also complete the Wabash Alloys Divisional Visitor and Contractor Safety Rules form prior to entry into the facility.

In those cases where contractors will perform work directly to or on the process equipment in which the Chlorine is present, the Safety Coordinator and Maintenance Supervisor will provide an orientation section to them prior to beginning operations. This orientation will include an introduction to the Wabash Alloys Process Safety Management Program, information concerning the toxicological and physical hazards of Chlorine, and the emergency response plan in the case of an incident involving a release. Upon completion, the contractor will be issued a permit by the Maintenance Supervisor to begin work.

The Wabash facility and the Chlorine Process

Wabash Alloys provides employment for 84 workers in Tipton, Indiana. This facility is one of eight other Aluminum recycling plants in the United States owned by Connell Ltd. As a manufacturer of aluminum ingots, its products are sold globally under its corporate company, Connell, 1 International Place, Fort Hill Square, Boston Massachusetts.

Site Description:
The facility is located in Tipton, Indiana, in the Tipton, Indiana Industrial Park at 841 South 550 West. Geography and Weather: The city of Tipton is located in approximately 25 miles from Indianapolis. The city is a part of Tipton County.

Transportation in the county is via U.S. 31 and State Roads 28, 19 and 213. Interstate 465 is within a 25-minute drive South on U.S. 31. Interstates 65 and 69 are 30-minutes from Tipton County. Railroads include service by Norfolk & Western Railway Co. and Norfolk & Western Railway are subsidiaries of Norfolk Southern Corp. which serves the Tipton area as well as 26

states and most major cities east of the Mississippi River.

The nearest airport is the Indianapolis International Airport is a 45-55 minute drive from Tipton, and is serviced by most of the major airlines in the U.S.

The annual average temperature in January is 29.90 and in July 75.70. The average annual precipitation is 40.7" with an average annual humidity of 73%.

Population and Labor Force:
The population in the city of Tipton in 1996 is 5,164. The labor force is 8,840.

Government and Law Enforcement:
The government type is a Board of County Commissioners. Also, there are seven County Council members. Law Enforcement is by a police force of 9 full-time and four reserve police officers. There is a 911 service available.

Fire Department:
There are ten full-time and two part-time firefighters.

Schools:
The population is serviced by two elementary schools, one junior high and one high school.

Medical Care:
The town is supported by an acute care facility, Tipton County Memorial Hospital.

Operation Description:
Previously the site was owned and operated by U.S. Reduction Company. While owned by U.S. Reduction Company, a secondary aluminum smelter operation was constructed and is presently in use by Wabash Alloys. The site was purchased by Wabash Alloys in 1998.

The site process involves the sorting, grading, processing (removing organics via a rotary kiln), melting, and alloying of metals for sale. As part of the sorting process, large aluminum scrap is shredded or crushed, and ferrous metals are removed using a maseparation process. A dryer with a secondary combustion unit and baghouse is used to remove impurities from the aluminum scrap such as moisture, paints and resins.

The sorted aluminum is charged into one of three furnaces where the metal is melted. Once melted, various additives are used to modify the composition and hence the physical characteristics of the metal. The metal is degassed by bubbling nitrogen through the molten metal. Magnesium is removed by bubbling chlorine through the melt to form magnesium chloride. Materials kept on-site for the process are aluminum, magnesium, zinc, copper, silicon, sodium, beryllium, and strontium. All of these materials are in solid form and are stored inside the facility, except for the aluminum, which is kept outside. Approximately 8,000,000 pounds of these materials are on-site at any given time.

Once the molten product is prepared, the melt is either poured and cooled as ingots or sows, or is transferred to heated crucibles for shipment as a molten material. Particulate emissions from the crusher are controlled with a baghouse. The emissions from the dryer are treated first using a secondary combustion unit, and then with a baghouse. Emissions from melters, ingot and sow molding processes, and dross cooling operations are controlled using a baghouse.

Chlorine is received at the facility in one ton containers. There are eleven containers as the main supply and four containers as a storage pad. The containers are connected into piping through

which chlorine as a liquid flows to a vaporizer at a pressure of 150 psi.

The vaporizer heats the chlorine to the vapor state by a recirculated hot water electric heater which is thermostatically controlled. Chlorine gas exits the vaporizer through a regulator and into a piping manifold. Each furnace has its own chlorine supply pipe and flowmeter which regulates the pressure.

At each particular furnace the chlorine gas passes a shut off valve, then through another flowmeter, and then through a needle valve where its flow is regulated by the furnace operator to the molten metal pump.

Close to the needle valve is the tubing connection that connects to a carbon lance which feeds the gas to the pump housing. Here the chlorine reacts with magnesium and aluminum to demag and clean the aluminum alloy.

General accidental release prevention program and chemical-specific prevention steps: Prevention of a release is a core component of the Wabash, LLC Risk Management Program. This program is designed to insure proper work practices and an on-going mechanical integrity program. This program also insures compliance with 29 CFR 1910.38, 1910.120, 1910.1200, 40 CFR, Part 68, Part 112, and Part 260.

Wabash Alloys has developed and implemented written operating procedures to provide clear instructions for safely conducting activities involved in the processes at each operation by our employees, consistent with the process safety information and to address steps for each handling phase, limitations, safety and health considerations, and safety systems and their functions. Other written documentation of standard operating procedures as a part of this program is included in the following documents:

Mechanical Integrity Study of Process Equipment

Preventive Maintenance Program

Written Emergency Response Plan

Employee Emergency Action and Evacuation Plan

Job Safety Analysis

Training:
Each employee involved in operations within the process where Chlorine is received, processed, or used at the facility has been trained in an overview of the process and in the operating procedures as outlined by 29 CFR 1910.119. Refresher training is provided no less than every three years and more often if necessary.

Mechanical Integrity:
Also, each maintenance person who has responsibilities to perform maintenance on the process components receives training on an as needed basis, but no less than every three years.

Emergency Response:
A team of individuals has been trained and is equipped as a HAZMAT team. The team is equipped with Self-Contained Breathing Apparatuses, Level A suits and monitoring equipment to respond in an offensive manner.

A record of the training, which contains the identity of the employee, the date of training, and the means, used to verify that the employee understood the training is completed and maintained.

Contractors:
Designated personnel have specific responsibilities related to the use of contractors who perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to areas where the Chlorine is received, stored, or processed in the facility. These responsibilities include specific requirements in selection of contractors regarding the contractor's safety performance and programs; the provision of information concerning the emergency action plans related to the process; development and implementation of safe work practices regarding the control of entrance and exit of contract employers and contract employees in the process areas, periodic evaluation of the contractor related to safety management at the process; maintenance of certain records related to contractor employee injury and illness; development of written procedures for any new processes, and provision of training to employees.

Five-year accident history:
No incidences of chlorine release have occurred at the facility that resulted in deaths or significant property damage on site, or known offsite deaths, injuries, evacuations, sheltering in place, property damage, or environmental damage.

Emergency response program:
Due to the receipt, usage, and storage of Chlorine in large quantities, Wabash Alloys takes a proactive approach to the protection of its employees, the public, and the environment. In consideration of the hazardous effects that Chlorine may have on human health and the environment the following outlines the facilities prevention and emergency response plans:

Written Emergency Response Plan

Offensively Trained & Equipped Emergency Action Team in accordance with 29 CFR 1910.120

Development of a Written Implementation Plan of Action

Conduction of Hazard Analysis on routine and periodic basis

Development of and documentation of safe work practices

Initial and periodic training of employees

Conduction of pre-startup safety reviews

Conduction of Compliance Audits

Conduction of incident investigations

Contractor Program Safety Program

Hot Work Permit Program

Process Safety Management & Chemical Accidental Release Prevention Committee

Mechanical Integrity & Preventive Maintenance Program

Determination and planning for Worst-Case and Alternative Case Release Scenarios

Continual evaluation for methods to improve facility safety - Safety Committee

Meetings with the Local Emergency Planning Committee and Fir Department

Planned changes to improve safety
In an attempt to insure a continual improvement in the facility worker protection and release prevention programs, training concerning this safety and environmental program and others is conducted for an average f 24 hours each year. This training requires the attendance by all personnel whose job may have any relationship to the chlorine operations.

Appendix A: Secondary Aluminum Production

Company Name: Wabash Alloys L.L.C.
Address City IN 841 South 550 West Tipton, Indiana 46072
Part 70: T 159-14125
Plt ID: 159-00008
Reviewer: Mark L. Kramer
Date: March 12, 2001

Aluminum Reverberatory Smelting Furnaces #1 & #2 (1992)

Process Emissions From Melting Including Fluxing/Chlorine TYPE OF MATERIAL		Throughput lbs/hr	1 ton/2000 lbs	tons/hr	PM/PM-10 Control Efficiency	PM/PM-10 Capture Efficiency	
Aluminum		39800 (9.95 tons/hr each)	2000	19.90	90.70%	100.00%	
	PM	**PM-10**	**SOx**	**NOx**	**VOC**	**CO**	**Lead**
	lbs/ton Produced	**lbs/ton Produced**	**lbs/ton Produced**	**lbs/ton Produced**	**lbs/ton Produced**	**lbs/tons Produced**	lbs/tons Produced
Emission Factor Before Contro	4.30	2.60	0.135	0.380	0.752	0.490	0.019
Emission Factor After Control	0.800	0.800	0.135	0.380	0.752	0.490	0.002
Potential Emissions tons/year	374.8	226.6	11.77	33.1	65.5	42.7	1.630
Fugitive Uncaptured tons/year	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Stack Emissions tons/year after Controls	69.73	69.73	11.77	33.12	65.55	42.71	0.152
Total After Controls tons/year	69.73	69.73	11.77	33.12	65.55	42.71	0.152

PM-10 = PM and VOC & CO emission factors from 1999 stack test of Wabash Alloys Dickson Plant + 50%, SO2 and NOx emission factors from 1994 stack test of Wabash Alloys Dickson Plant + 50% & Pb emission factor from the 1996 stack test of Wabash Alloys Furnace #5 -Wabash Plant + 50%.

Pouring/Casting (1992)

TYPE OF MATERIAL		Throughput lbs/hr	1 ton/2000 lbs	tons/hr		
Aluminum		39800	2000	19.9		
	PM	**PM-10**	**SOx**	**NOx**	**VOC**	**CO**
	lbs/ton metal char	**lbs/ton metal charg**	**lbs/ton metal charg**	**lbs/ton metal charge**	**lbs/ton metal charged**	**lbs/tons metal charg**
Emission Factor before Control	--	--	0.02	0.010	0.140	0.000
SCC# 3-04-001-14						
Potential Emissions tons/year	0.000	0.000	1.74	0.872	12.2	0.000

Scrap Shredder (1996)

TYPE OF MATERIAL		Throughput lbs/hr	1 ton/2000 lbs	tons/hr	PM/PM-10 Control Efficiency %	PM/PM-10 Capture Efficiency %
Aluminum		46000	2000	23.00	98.00%	99.00%
	Outlet Grain Loadin gr/dscf	Flow Rate @ 70F acfm	**PM**	**PM-10**	**PM/PM-10 Emission Factor**	
	0.01	34,130			**2.083 lb/ton From Stack Test Before Controls**	
Potential Emissions based on Tipton Stack Tests Before Controls tons/year			209.84	209.84		
Fugitive Uncaptured based on Tipton Stack Tests tons/year			2.10	2.10		
Potential Stack Emissions based on Tipton Stack Tests After Controls tons/year			4.15	4.15		
Total After Controls based on Stack Tests tons/year			6.25	6.25		
Stack Emissions tons/year after Controls Based on Grain Loading			12.81	12.8		
Total After Controls based on grain loading tons/year			14.9	14.9		
Limited Potential to Emit based on 0.98 lbs/ton EF tons/year			98.73	98.73	Limited to 0.98 lbs of P	

MACT Standard is a grain loading of 0.01 gr/dscf pursuant to Subpart RRR Compliance, and limited to 0..98 pounds of PM & PM10 per ton equivalent to 98.7 TPY to rend

except HCL, DF and HF which are from Wabash Alloys V

HAPs from Reverberatory Furnaces #1 and # SCC 3-04-001-09 from Fires V.6.23 tests +50%

Throughput (lbs/hr) 39800	lb/lb of Al Proces Antimony	lb/lb of Al Proces Arsenic	lb/lb of Al Proces Cadmium	lb/lb of Al Process Chromium	lb/lb of Al Processe Formaldehyde	lb/lb of Al Process Hydrogen Chloride
After Controls w/baghouse & lir	4.29E-09	6.32E-10	1.40E-09	2.02E-08	1.38E-07	2.7E-04
Potential Emissions Before Controls tons/year	0.0080	0.0012	0.0026	0.0379	0.0241	503.1644
Potential Emissions After Controls tons/year	0.00074784996	0.00011017277	0.0002440536	0.0035213448	0.024056712	46.805994

Note: HCL and HF are controlled by the injection of lime in the baghouses.

	lb/lb of Al Proces Hydrogen Fluori	lb/lb of Al Proces Lead	lb/lb of Al Proces Manganese	lb/lb of Al Process Mercury	lb/lb of Al Processe Nickel	lb/lb of Al Process Selenium
After Controls w/baghouse	1.28E-04	5.18E-09	3.20E-08	2.8E-09	2.34E-08	1.25E-09
Potential Emissions Before Controls tons/year	238.9328	0.0097	0.0600	0.0052	0.0439	0.0023
Potential Emissions After Controls tons/year	22.22631	0.00090299832	0.005578	0.0004881072	0.0040791816	0.000217905

	lb/lb of Al Proces Polychlorinated Dibenzo	lb/lb of Al Proces Polychlorinated Dibenzo-p	**Total HAPs Before Controls tons/year**	**Total HAPs After Controls tons/year**
After Controls w/baghouse	4.86E-10	5.70E-11		
Potential Emissions Before Controls tons/year	0.0009	0.0001	**742.3**	**69.1**
Potential Emissions After Controls tons/year	8.472146E-05	9.936468E-06		

Loading and Unloading

The following calculations determine the amount of emissions created by truck loading and unloading of aggregate, based on 8760 hours of use and AP-42, Ch 13.2.4 (Fifth edition, 1/95).

PM Ef =	k*(0.0032)* (U/5)^1.3/(M/2)^1.4		PM-10 Ef =	k*(0.0032)* (U/5)^1.3/(M/2)^1.4	
=	0.0154	lb/ton	=	0.0073	lb/ton
where k =	0.74	(particle size multiplie	where k =	0.35	(particle size multiplier)
U =	10	mile/hr mean wind sp	U =	10	mile/hr mean wind speed
M =	1	% material moisture c	M =	1	% material moisture content

Scrap Handled is 19.9 tons/hr based on 9.95 tons/hr/furnace
Therefore, PM = 1.34 tons/year Therefore, PM-10 0.634 tons/year

Dross Handling is 2 tons/hr
Therefore, PM = 0.135 tons/year Therefore, PM-10 0.064 tons/year

Paved Roads

Applicant Calculated PM 11 tons/year before controls
Applicant Calculated PM 2.2 tons/ year after controls with 80% credit given for speed limit of 15 mph based upon Ohio EPA RACM Guide.

Degreaser

Usage 87.28 gallons/year
Density of Solve 6.8 lbs/gallon
Assume 100% VOC

VOC = 0.297 tons/year

Assay Furnace deemed Insignificant Activity

Capacity: 5E-05 tons/hr

PM = PM-10 Emission Factor lbs/ton
0.52
Potential PM Emissions tons/yr 0.0001

Appendix A: Emissions Calculations
All Natural Gas Combustion

Company Wabash Alloys L.L.C.
Address (841 South 550 West, Tipton, Indiana 46072
Part 70: T 159-14125
Plt ID: 159-00008
Reviewer: Mark L. Kramer
Date: March 12, 2001

	Total mmBtu/hr
Four (4) burners for reverberatory furnaces #1 and #2 ratec	64

	tons/hr
Reverberatory furnaces #1 and #2, capacity: 9.95 tons/hr e	19.90

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
64.00	533.94

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
AP-42 Emission Factor in lb/MM	1.9	7.6	0.6	100.0	5.5	84.0
Emission Factor in lb/MMCF fro		42.0				
Emission Factor in lb/ton from S	0.24		0.006	**see below		
Worst Case 'Potential Emissi	**20.919**	**11.213**	**0.523**	**26.697**	**1.468**	**22.426**

*PM and SO2 emission factors are from the Wabash Alloys 1999 stack test at Dickson, TN.
PM-10 emission factor is from the Wabash Alloys 1994 stack test at Dickson, TN.
AP 42 Emission Factors are from Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32
*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

HAPs Emissions

Company Wabash Alloys L.L.C.
Address C 841 South 550 West, Tipton, Indiana 46072
Part 70: T 159-14125
Plt ID: 159-00008
Reviewer: Mark L. Kramer
Date: March 12, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00056	0.00032	0.02002	0.48055	0.00091

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Sub-total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	0.00013	0.00029	0.00037	0.00010	0.00056	0.504

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Company Wabash Alloys L.L.C.
Address (841 South 550 West, Tipton, Indiana 46072
Part 70: T 159-14125
Plt ID: 159-00008
Reviewer: Mark L. Kramer
Date: March 12, 2001

	Total mmBtu/hr	
Nine (9) pot furnaces rated at 2.0 mmBtu/hr each	18	
Seven (7) ladle heater/pot stands rated at 2.0 mmBtu/hr each	14	
Insignificant Activities		
Eight (8) space heaters, rated at 0.08 mmBtu/hr each. (revised)	0.64	
Four (4) molten metal pump preheater boxes, rated at 0.8 mmBtu/hr each.	3.2	
	35.84	Total

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
35.84	299.01

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.284	1.136	0.0897	14.950	0.822	12.558

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,050 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

TSD Addendum

HAPs Emissions

Company Wabash Alloys L.L.C.
Address (841 South 550 West, Tipton, Indiana 46072
Part 70: T 159-14125
Plt ID: 159-00008
Reviewer: Mark L. Kramer
Date: March 12, 2001

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.00031	0.00018	0.01121	0.26911	0.00051

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Sub-total HAPs
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	0.00007	0.00016	0.00021	0.00006	0.00031	0.282

TSD Addendum

Company Wabash Alloys L.L.C.
Address (841 South 550 West, Tipton, Indiana 46072
Part 70: T 159-14125
Plt ID: 159-00008
Reviewer: Mark L. Kramer
Date: March 12, 2001

Ladle Repair and Cleaning

Cleaning I 78 tons per year
Ladle Rep 1 per month

Ladle Cleaning Throughput	**Ladle Cleaning Emission Factor PM**	**Ladle Cleaning Emissior Factor PM-10**	**Potential PM Emission**	**Potential PM-10 Emission**	**Potential @ 78 tons/year PM Emission**	**Potential PM-10 Emission**
lbs/hr	lbs/ton	lbs/ton	lbs/hr	lbs/hr	tons/yr	tons/yr

1000	1.70	1.70	0.850	0.850	**0.066**	**0.066**

Potential 1@8,000 lbs/month

Ladle Repair Throughput	Material Removed From Lad During Repair Is PM	Ladle Repair Emissior Factor PM	Ladle Repair Emission Factor PM-10	Potential PM Emission	Potential PM-10 Emission	Potential PM Emission	Potential PM-10 Emission
lbs/hr		lbs/ton	lbs/ton	lbs/hr	lbs/hr	tons/yr	tons/yr
1333.33	0.075%	1.5000	1.5000	1.00	1.00	**0.036**	**0.036**

Based on a minimum of six hours to remove 8,000 lbs of refractory

Total Potential PM Emission	Total Potential PM-10 Emission
tons/yr	tons/yr
0.102	**0.102**

Overall Summary Including Natural Gas Combustion Before Controls (tons per year)

Description	PM	PM-10	SOx	NOx	VOC	CO	HAPs
Process Emissions From							
Reverberatory Furnaces #1 & #2	374.8	226.6	11.8	33.1	65.5	42.7	743.9
Pouring/Casting	0	0	1.743	0.872	12.2	0	0
Scrap Shredder	209.8	209.8	0	0	0	0	0
Scrap and Dross Loading and Unloadir	1.476	0.698	0	0	0	0	0
Paved Roads	11	11	0	0	0	0	0
Degreaser	0	0	0	0	0.297	0	0
Assay Furnace	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Natural Gas Combustion							
Reverberatory Furnaces #1 & #2	20.9	11.2	0.523	26.7	1.47	22.4	0.504
Other Natural Gas Combustion (revise	**0.284**	**1.14**	**0.090**	**15.0**	**0.822**	**12.6**	**0.282**
Ladle Cleaning and Repair (added)	**0.102**	**0.102**	0	0	0	0	0
Subtotal (revised)	**618.4**	**460.5**	**14.2**	**75.6**	**80.3**	**77.7**	**744.7**
Other Insignificant Activities	**4.34**	**14.0**	**1.5**	**23.4**	**18.7**	**21.3**	**1.0**
Total	**622.7**	**474.5**	**15.7**	**99.0**	**99.0**	**99.0**	**745.7**

Overall Summary Including Natural Gas Combustion After Controls (tons per year)

Description	PM	PM-10	SOx	NOx	VOC	CO	Total HAPs
Process Emissions From							
Reverberatory Furnaces #1 & #2	69.7	69.7	11.8	33.1	65.5	42.7	69.2
Pouring/Casting	0	0	1.743	0.872	12.2	0	0
Scrap Shredder	98.7	98.7	0	0	0	0	0
Scrap and Dross Loading and Unloadir	1.476	0.698	0	0	0	0	0
Paved Roads	2.20	2.20	0	0	0	0	0
Degreaser	0	0	0	0	0.297	0	0

Assay Furnace	0.000	0.000	0.000	0.000	0.000	0.000	
Natural Gas Combustion							
Reverberatory Furnaces #1 & #2	20.9	11.2	0.523	26.7	1.47	22.4	0.504
Other Natural Gas Combustion (revise	0.284	1.14	0.090	14.95	0.822	12.56	0.282
Ladle Cleaning and Repair (added)	0.102	0.102	0	0	0	0	0
Subtotal (revised)	**193.4**	**183.7**	**14.2**	**75.6**	**80.3**	**77.7**	**70.0**
Other Insignificant Activities	**4.34**	**13.96**	**1.50**	**23.38**	**18.71**	**21.34**	**1.00**
Total	**197.7**	**197.7**	**15.7**	**99.0**	**99.0**	**99.0**	**71.0**

Limited Emissions After Controls (tons per year)

Description	**PM**	**PM-10**	**SOx**	**NOx**	**VOC**	**CO**	**Total HAPs**	
Process Emissions From								
Reverberatory Furnaces #1 & #2 (1992	69.7	69.7	11.8	33.1	65.5	42.7	69.2	
Pouring/Casting (1992)	0	0	1.743	0.872	12.2	0	0	
Scrap and Dross Loading and Unloadir	1.48	0.698	0	0	0	0	0	
Paved Roads (1992)	2.2	2.2	0	0	0	0	0	
Degreaser (1992)	0	0	0	0	0.297	0	0	
Assay Furnace (1992)	0.000	0.000	0.000	0.000	0.000	0.000		
Natural Gas Combustion								
Reverberatory Furnaces #1 & #2 (1992	20.9	11.2	0.523	26.7	1.47	22.4	0.504	
Other Natural Gas Combustion (revise	0.284	1.14	0.090	15.0	0.822	12.6	0.282	
Ladle Cleaning and Repair (added) (19	0.102	0.102	0	0	0	0	0	
Subtotal (revised)	**94.7**	**85.0**	**14.2**	**75.6**	**80.3**	**77.7**	**70.0**	
Other Insignificant Activities (Balanc	4.34	13.96	1.50	23.38	18.71	21.34	1	except SO2 & HAPs
Limits to maintain minor PSD source								
Scrap Shredder (1996)	98.7	98.7	0	0	0	0	0	
Total	**197.7**	**197.7**	**15.7**	**99.0**	**99.0**	**99.0**	**71.0**	